

## Financial Statements and Federal Single Audit Report

## Chehalis School District No. 302

For the period September 1, 2021 through August 31, 2022

Published July 3, 2023 Report No. 1032851



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### Office of the Washington State Auditor Pat McCarthy

July 3, 2023

Board of Directors Chehalis School District No. 302 Chehalis, Washington

### Report on Financial Statements and Federal Single Audit

Please find attached our report on Chehalis School District No. 302's financial statements and compliance with federal laws and regulations.

We are issuing this report in order to provide information on the District's financial condition.

Sincerely,

Pat McCarthy, State Auditor

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Olympia, WA

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### SCHEDULE OF FINDINGS AND QUESTIONED COSTS

### Chehalis School District No. 302 September 1, 2021 through August 31, 2022

### SECTION I – SUMMARY OF AUDITOR'S RESULTS

The results of our audit of Chehalis School District No. 302 are summarized below in accordance with Title 2 *U.S. Code of Federal Regulations* (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance).

### **Financial Statements**

We issued an unmodified opinion on the fair presentation of the District's financial statements in accordance with its regulatory basis of accounting. Separately, we issued an adverse opinion on the fair presentation with regard to accounting principles generally accepted in the United States of America (GAAP) because the financial statements are prepared using a basis of accounting other than GAAP.

Internal Control over Financial Reporting:

- *Significant Deficiencies:* We reported no deficiencies in the design or operation of internal control over financial reporting that we consider to be significant deficiencies.
- *Material Weaknesses:* We identified no deficiencies that we consider to be material weaknesses.

We noted no instances of noncompliance that were material to the financial statements of the District.

### Federal Awards

Internal Control over Major Programs:

- *Significant Deficiencies:* We reported no deficiencies in the design or operation of internal control over major federal programs that we consider to be significant deficiencies.
- *Material Weaknesses:* We identified deficiencies that we consider to be material weaknesses.

We issued an unmodified opinion on the District's compliance with requirements applicable to each of its major federal programs, with the exception of the 32.009 - Emergency Connectivity

Fund Program on which we issued an adverse opinion on compliance with applicable requirements.

We reported findings that are required to be disclosed in accordance with 2 CFR 200.516(a).

### **Identification of Major Federal Programs**

The following programs were selected as major programs in our audit of compliance in accordance with the Uniform Guidance.

<u>ALN</u>	Program or Cluster Title
10.555	Child Nutrition Cluster – National School Lunch Program
10.559	Child Nutrition Cluster – Summer Food Service Program for Children
32.009	COVID-19 – Emergency Connectivity Fund Program
84.027	Special Education Cluster (IDEA) – Special Education Grants to States
84.027	Special Education Cluster (IDEA) – COVID-19 – Special Education Grants to States
84.173	Special Education Cluster (IDEA) – Special Education Preschool Grants
84.173	Special Education Cluster (IDEA) – COVID-19 – Special Education Preschool Grants
84.425	COVID-19 – Education Stabilization Fund

The dollar threshold used to distinguish between Type A and Type B programs, as prescribed by the Uniform Guidance, was \$750,000.

The District qualified as a low-risk auditee under the Uniform Guidance.

### SECTION II – FINANCIAL STATEMENT FINDINGS

None reported.

## SECTION III – FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

See Findings 2022-001 and 2022-002.

## SCHEDULE OF FEDERAL AWARD FINDINGS AND OUESTIONED COSTS

### Chehalis School District No. 302 September 1, 2021 through August 31, 2022

The District did not have adequate internal controls for ensuring compliance with wage rate requirements.

**Assistance Listing Number and Title:** 84.425, COVID-19 Education

Stabilization Fund

**Federal Grantor Name:** US. Department of Education

**Federal Award/Contract Number:** N/A

Pass-through Entity Name: Office of Superintendent of Public

Instruction

Pass-through Award/Contract COVID-19, 84.425D-0120437

Number: COVID-19, 84.425D-0120181

COVID-19, 84.425D-0120181 COVID-19, 84.425U-0137150

COVID-19, 84.425U-0138065

COVID-19, 84.425U-0142501

COVID-19, 84.425U-0712008

COVID-19, 84.425U-0712141

**Known Questioned Cost Amount:** \$0

### **Background**

The objectives of the Education Stabilization Fund (ESF) program are to prevent, prepare for and respond to the COVID-19 pandemic. In fiscal year 2022, the District spent \$2,795,654 of its ESF awards. This included \$1,122,978 in the Elementary and Secondary School Emergency Relief (ESSER I and II) Fund subprogram (84.425D) and \$1,672,676 in the American Rescue Plan Elementary and Secondary School Emergency Relief (ARP ESSER/ESSER III) subprogram (84.425U).

Federal regulations require recipients to establish and maintain internal controls that ensure compliance with program requirements. These controls include understanding grant requirements and monitoring the effectiveness of established controls.

Under federal wage rate requirements, also known as the Davis-Bacon Act, contractors and subcontractors that work on projects financed with more than \$2,000 of federal money must pay laborers and mechanics wage rates that the U.S. Department of Labor considers being similar to what local workers have been paid for similar projects.

For construction contracts subject to these wage rate requirements, the District must include a provision that the contractor and subcontractor comply with those requirements and the Department of Labor's regulations. This includes a requirement for the contractor and its subcontractors to submit to the District weekly, for each week in which any contract work is performed, certified payroll reports. These reports must include a copy of the payroll and a signed statement of compliance.

### **Description of Condition**

During the 2021–22 school year, the District paid \$189,061.32 from its ESSER II and ESSER III awards to pay three contractors to replace a heating, ventilation and air conditioning system valve, provide voltage wiring and concrete path access to portable buildings, and replace lunchroom windows with awnings. These projects were part of the District's school facility capital improvement efforts to prevent the spread of COVID-19 and enable school operations by facilitating greater air flow and filtration.

Our audit found the District did not have adequate internal controls for ensuring compliance with prevailing wage rate requirements. Specifically, the District did not include the required prevailing wage rate clauses in the contracts.

We consider this deficiency in internal controls to be a material weakness, which led to material noncompliance.

The issue was not reported as a finding in the prior audit.

### Cause of Condition

While District officials were aware of state prevailing wage requirements, they did not know federal regulations required the contracts between the District and the contractors include specific language to meet prevailing wage rate requirements.

### Effect of Condition

Without adequate internal controls that ensure it includes the required prevailing wage rate clauses in its contracts, the District cannot demonstrate it complied with

the federal wage rate requirements. The District could also be liable for paying any additional wages if the contractors did not pay prevailing wage rates to laborers working on the contracts.

### Recommendation

We recommend the District develop internal controls that ensure compliance with federal wage rate requirements. This should include inserting prevailing wage clauses into all public works contracts paid with federal funds.

### District's Response

It is highly unusual for the district to utilize federal funds for construction projects; the Covid-19 Education Stabilization Funds were an anomaly. The District's Director of Business and Operations was unaware that prevailing wage clauses are required to be included in all public works contracts over \$2,000 that are paid with federal funds. She was aware that prevailing wages need to be paid. The audit finding does not dispute that prevailing wages were paid appropriately, just that the clauses were not included in the contracts. To be very clear, this finding is for not having required language in contracts. The District is now aware that inclusion of the clauses is a compliance requirement.

Going forward, it is unlikely that federal funds will be used for construction projects; however, when federal funds are utilized for construction projects, the District will either include the required prevailing wage rate clauses in its contracts or will obtain a separate signed clause with the required prevailing wage rate information.

### Auditor's Remarks

We appreciate the District's commitment to resolve these issues and thank the District for its cooperation and assistance during the audit. We will review the corrective action taken during our next regular audit.

### Applicable Laws and Regulations

Title 2 U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), section 516, Audit findings, establishes reporting requirements for audit findings.

Title 2 CFR Part 200, Uniform Guidance, section 303, Internal controls, describes the requirements for auditees to maintain internal controls over federal programs and comply with federal program requirements.

The American Institute of Certified Public Accountants defines significant deficiencies and material weaknesses in its *Codification of Statements on Auditing Standards*, section 935, Compliance Audits, paragraph 11.

Title 29 CFR, Section 5.5 – Contract provisions and related matters establishes the requirements for the contracting officer to insert in full in any contract in excess of \$2,000 which is entered into for the actual construction, alteration and/or repair, including painting and decorating, of a public building or public work, or building or work financed in whole or in part with federal funds the clauses listed, which includes but is not limited to the minimum wages to be paid and payrolls and basic records to be maintained (submission of weekly certified payrolls).

## SCHEDULE OF FEDERAL AWARD FINDINGS AND OUESTIONED COSTS

### Chehalis School District No. 302 September 1, 2021 through August 31, 2022

2022-002 The District did not have adequate internal controls for ensuring compliance with allowable activities and costs and restricted purpose requirements.

**Assistance Listing Number and Title:** 32.009, COVID-19 – Emergency

**Connectivity Fund Program** 

**Federal Grantor Name:** Federal Communications

Commission

Federal Award/Contract Number: ECF2190003531

ECF2190003532

**Pass-through Entity Name:** N/A

Pass-through Award/Contract

Number: N/A

**Known Questioned Cost Amount:** \$563,021

### Background

The Emergency Connectivity Fund (ECF) Program provides funding to meet the needs of students and school staff who would otherwise lack access to connected devices and broadband connections sufficient to engage in remote learning. This is referred to as "unmet need." In fiscal year 2022, the District spent \$563,021 in ECF Program funds to purchase laptops and Wi-Fi hotspot services for students.

Federal regulations require recipients to establish and maintain internal controls that ensure compliance with program requirements. These controls include understanding grant requirements and monitoring the effectiveness of established controls.

Allowable activities and costs

ECF Program recipients may only seek reimbursement for eligible devices and services provided to students and staff with unmet need. Recipients are prohibited

from seeking reimbursement for eligible equipment and services used solely at the school or held for future use (i.e., warehousing).

Restricted purpose – unmet need

When submitting applications to the Federal Communications Commission (FCC), schools only had to provide an estimate of their students' and staff's unmet need. However, when requesting reimbursement, the District could only request program funds for eligible equipment and services provided to students and school staff with actual unmet need.

*Restricted purpose – per-location and per-user limitations* 

The FCC imposed per-location and per-user limitations to maximize the use of limited funds. Under the program, eligible schools could only be reimbursed for one connected device and Wi-Fi hotspot per student or school employee with unmet need, and no more than one fixed broadband connection per location, such as a student's or employee's residence.

### **Description of Condition**

Allowable activities and costs/restricted purpose – unmet need

The District estimated unmet need for eligible equipment and services when it applied for ECF Program funds. However, our audit found the District did not document its determination of actual unmet need for the equipment provided to students. Specifically, the District purchased laptops and Wi-Fi hotspots services, based on its estimate of unmet need, and it requested reimbursement for these purchases totaling \$563,021. However, the District did not maintain documentation showing it provided equipment paid with program funds to a student or employee with unmet need.

*Restricted purpose – per-location and per-user limitations* 

Our audit found the District's internal controls were ineffective for demonstrating it complied with the FCC's per-location and per-user limitations. Specifically, the District did not maintain documentation showing it monitored or had a tracking process in place to ensure it only provided one device or connection per user and location.

We consider these deficiencies in internal controls to be material weaknesses that led to material noncompliance.

This issue was not reported as a finding in the prior audit.

### Cause of Condition

Allowable activities and costs/restricted purpose – unmet need

The District experienced turnover in the position responsible for managing this program, and current staff could not locate records supporting actual unmet need.

*Restricted purpose – per-location and per-user limitations* 

Staff said they did not know about the requirement to maintain documentation showing the District only provided one device and/or connection per student and employee.

### Effect of Condition and Questioned Costs

Allowable activities and costs/restricted purpose – unmet need

Because the District did not have documentation supporting whether it provided eligible equipment and services to students with actual unmet need, it cannot demonstrate compliance with the program's requirements. Given the nature of the program and circumstances, it is likely that at least some of the equipment and services the District charged to the award addressed unmet needs. However, the lack of a documented assessment of students' actual unmet need means that all costs are unsupported. Since we do not have a reasonable basis for estimating how much of the District's expenditures are allowable, we are questioning all unsupported costs.

Federal regulations require the State Auditor's Office to report known questioned costs that are greater than \$25,000 for each type of compliance requirement. We question costs when we find the District does not have adequate documentation to support expenditures.

*Restricted purpose – per-location and per-user limitations* 

Because the District did not maintain documentation, it cannot demonstrate compliance with the FCC's restrictions. Additionally, we cannot determine whether the District only provided one device or connection per user and location.

### Recommendation

We recommend the District work with the granting agency to determine audit resolution.

We further recommend the District establish and follow internal controls to ensure staff fully understand the requirements for ECF awards. Specifically, the District should:

- Request reimbursement only for eligible equipment and services provided to students with unmet need, and maintain documentation demonstrating compliance
- Provide no more than one device per student and employee, and no more than one broadband connection per location, in compliance with the ECF Program's requirements

### District's Response

The Chehalis School District does not concur with the audit finding or with the questioned costs. The audit finding addresses documentation/inventory issues. Funds were not misused. The District has internal controls over asset inventory and provided equipment only to students and staff with unmet needs, and all costs were allowable, reasonable and necessary. The District does agree that internal controls and processes could be improved; however, this was during the pandemic. Our efforts were geared, most importantly, toward the health and safety of students and families.

We believe the appropriate level of reporting would be a management letter because all costs were allowable and devices were only provided to those with unmet need.

The audit's description of condition states that "The District estimated unmet need for eligible equipment and services when it applied for Emergency Connectivity Fund (ECF) Program funds. However, our audit found the District did not document its determination of actual unmet need for the equipment provided to students. Specifically, the District purchased chromebooks and Wi-Fi hotspots services, based on its estimate of unmet need, and it requested reimbursement for these purchases totaling \$563,021. However, the District did not maintain documentation showing it provided equipment paid with program funds to a student or employee with unmet need." And additionally, "Our audit found the District's internal controls were ineffective for demonstrating it complied with the FCC's per-location and per-user limitations. Specifically, the District did not maintain documentation showing it monitored or had a tracking process in place to ensure it only provided one device or connection per user and location."

Based on the guidance below, we have spent all funds for allowable costs and those costs were reasonable and necessary and for students with unmet needs. Districts were able to determine whether students had unmet needs, and for our district this meant addressing instances where students may share a home device with others, the device was too old or slow to function properly, student owned devices did not have the appropriate security in place to protect students during remote learning, and operationally the District could not access personally owned devices to provide the thousands of technical questions and issues students faced during remote learning. Based on these experiences, unmet need was defined broadly, but within allowed parameters. Inventory records were kept, albeit, not perfectly in the case of our elementary aged students.

Devices for remote learning could also be used at school. During the pandemic in Washington State we experienced times when classrooms, schools and or districts were closed by health department and state regulations because of outbreaks. Districts had to be prepared to support remote learning each day with constantly changing guidance on who was allowed to provide instruction in person.

From the Federal Communications Commission (FCC) Order FCC-CIRC21-93-043021, question 77: "We think schools are in the best position to determine whether their students and staff have devices and broadband services sufficient to meet their remote learning needs, and we recognize that they are making such decisions in the midst of a pandemic. We, therefore, will not impose any specific metrics or process requirements on those determinations." And from question 53: "...we are sensitive to the need to provide some flexibility during this uncertain time. If those connected devices were purchased for the purpose of providing students...with devices for off-campus use consistent with the rules we adopt today, we will not prohibit such on-campus use."

During our audit, the State Auditor's Office (SAO) acknowledged that some of the chromebook expenditures may be reasonable and supported. However, the finding includes 100% questioned costs. The explanation from SAO about this is, "Since there was a control deficiency in terms of the grant compliance requirements, we were unable to determine costs were reasonable." We continue to assert that 100% of the costs were reasonable. The District was able to provide documentation of 100% of the purchase of the chromebooks. The chromebooks were purchased to support online student learning during the pandemic. These expenditures are allowable, reasonable and necessary. Of particular note is the fact that the District's adopted curriculum only works District-issued chromebooks. Therefore, any student without a suitable chromebook had an unmet need.

We continue to communicate with other agencies with the ultimate goal of helping the Federal Communications Commission (FCC) understand that they should not seek any recovery of funds resulting from "documentation" issues considering the massive public health response, deployment logistics, vague federal guidance, and the effective return to in-person learning.

We look forward to working with the FCC to resolve the questioned cost portion of this finding.

### Auditor's Remarks

The State Auditor's Office is sympathetic to the significant challenges the District faced during the COVID-19 pandemic, and deeply respects its commitment to student learning despite these challenges. SAO knows that in many cases, governments across Washington received significant pandemic-era federal funds without also receiving clear guidance on how to use them. Then, and now, SAO continues to advocate for clear, timely guidance from federal agencies to make sure Washington governments are not put in a difficult position at audit time. However, when auditing federal programs of any kind, governments must provide documentation to substantiate that they met the award requirements. As is our practice and audit standards require, we will review the status of this finding during our next audit. We value our partnership with the District in striving for transparency in public service.

### Applicable Laws and Regulations

Title 2 U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), section 516, Audit findings, establishes reporting requirements for audit findings.

Title 2 CFR Part 200, Uniform Guidance, section 303, Internal controls, describes the requirements for auditees to maintain internal controls over federal programs and comply with federal program requirements.

The American Institute of Certified Public Accountants defines significant deficiencies and material weaknesses in its *Codification of Statements on Auditing Standards*, section 935, Compliance Audits, paragraph 11.

Title 47 CFR Part 54, *Universal Service*, Subpart Q, Emergency Connectivity Fund, describes the ECF Program requirements.

### INDEPENDENT AUDITOR'S REPORT

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* 

### Chehalis School District No. 302 September 1, 2021 through August 31, 2022

Board of Directors Chehalis School District No. 302 Chehalis, Washington

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of Chehalis School District No. 302, as of and for the year ended August 31, 2022, and the related notes to the financial statements, which collectively comprise the District's financial statements, and have issued our report thereon dated June 28, 2023.

We issued an unmodified opinion on the fair presentation of the District's financial statements in accordance with its regulatory basis of accounting. We issued an adverse opinion on the fair presentation with regard to accounting principles generally accepted in the United States of America (GAAP) because, as described in Note 1, the *Accounting Manual for Public School Districts in the State of Washington* does not require the District to prepare the government-wide statements presenting the financial position and changes in financial position of its governmental activities as required by GAAP. The effects on the financial statements of the variances between the basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material.

## REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING

In planning and performing our audit of the financial statements, we considered the District's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control. Accordingly, we do not express an opinion on the effectiveness of the District's internal control.

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 financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is 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.

Our consideration of internal control was for the limited purpose described above and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified.

Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses.

### REPORT ON COMPLIANCE AND OTHER MATTERS

As part of obtaining reasonable assurance about whether the District's financial statements are free from 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 financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion.

The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

### PURPOSE OF THIS REPORT

The purpose of this report is solely 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 effectiveness of the District's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the District's internal control and compliance. Accordingly, this communication is not suitable for any other purpose. However,

this report is a matter of public record and its distribution is not limited. It also serves to disseminate information to the public as a reporting tool to help citizens assess government operations.

Pat McCarthy, State Auditor

Tat Macky

Olympia, WA

June 28, 2023

### INDEPENDENT AUDITOR'S REPORT

Report on Compliance for Each Major Federal Program and Report on Internal Control over Compliance in Accordance with the Uniform Guidance

### Chehalis School District No. 302 September 1, 2021 through August 31, 2022

Board of Directors Chehalis School District No. 302 Chehalis, Washington

## REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM

### **Adverse and Unmodified Opinions**

We have audited the compliance of Chehalis School District No. 302, with the types of compliance requirements identified as subject to audit in the U.S. Office of Management and Budget (OMB) Compliance Supplement that could have a direct and material effect on each of the District's major federal programs for the year ended August 31, 2022. The District's major federal programs are identified in the auditor's results section of the accompanying Schedule of Findings and Questioned Costs.

### Adverse Opinion on 32.009 - COVID 19 - Emergency Connectivity Fund Program

In our opinion, because of the significance of the matter described in the Basis for Adverse and Unmodified Opinions section of our report, the District did not comply, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on 32.009 – COVID-19 – Emergency Connectivity Fund Program for the year ended August 31, 2022.

### Unmodified Opinion on Each of the Other Major Federal Programs

In our opinion, the District complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its other major federal programs identified in the summary of auditor's results section of the accompanying Schedule of Findings and Questioned Costs for the year ended August 31, 2022.

### **Basis for Adverse and Unmodified Opinions**

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in Government Auditing Standards issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of the District and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our adverse and unmodified opinions on compliance for each major federal program. Our audit does not provide a legal determination of the District's compliance with the compliance requirements referred to above.

## Matter Giving Rise to Adverse Opinion on 32.009 - COVID-19 - Emergency Connectivity Fund Program

As described in the accompanying schedule of findings and questioned costs, the District did not comply with the requirements regarding 32.009 - COVID-19 - Emergency Connectivity Fund Program as described in finding number 2022-002 for activities allowed, allowable costs, and the restricted purposes special test requirements. Compliance with such requirements is necessary, in our opinion for the District to comply with the requirements applicable to that program.

### Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules and provisions of contracts or grant agreements applicable to the District's federal programs.

### Auditor's Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the District's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS, *Government Auditing Standards* and the Uniform Guidance will always detect a material noncompliance when it exists. The risk of not detecting a material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Noncompliance with the compliance requirements referred to above is considered material, if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgement made by a reasonable user of the report on compliance about the District's compliance with the requirements of each major federal program as a whole.

Performing an audit in accordance with GAAS, *Government Auditing Standards* and the Uniform Guidance includes the following responsibilities:

- Exercise professional judgment and maintain professional skepticism throughout the audit;
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and
  design and perform audit procedures responsive to those risks. Such procedures include
  examining, on a test basis, evidence regarding the District's compliance with the
  compliance requirements referred to above and performing such other procedures as we
  considered necessary in the circumstances;
- Obtain an understanding of the District's internal control over compliance relevant to the
  audit in order to design audit procedures that are appropriate in the circumstances and to
  test and report on internal control over compliance in accordance with the Uniform
  Guidance, but not for the purpose of expressing an opinion on the effectiveness of the
  District's internal control over compliance. Accordingly, no such opinion is expressed; and
- We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

### Other Matters

The results of our auditing procedures also disclosed an instance of noncompliance which is required to be reported in accordance with the Uniform Guidance and which is described in the accompanying Schedule of Federal Award Findings and Questioned Costs as Finding 2022-001. Our opinion on each major federal program is not modified with respect to these matters.

### District's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the District's response to the noncompliance findings identified in our compliance audit described in the accompanying Schedule of Federal Award Findings and Questioned Costs. The District's response was not subjected to the other auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

### REPORT ON INTERNAL CONTROL OVER COMPLIANCE

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed. Our consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance and therefore, material weaknesses or significant deficiencies may exist that were not identified.

However, we identified certain deficiencies in internal control over compliance, as described in the accompanying Schedule of Federal Award Findings and Questioned Costs as Findings 2022-001 and 2022-002 that we consider to be material weaknesses.

### District's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the District's response to the internal control over compliance findings identified in our audit described in the accompanying Schedule of Federal Award Findings and Questioned Costs. The District's response was not subjected to the other auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

### Purpose of this Report

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other

purpose. However, this report is a matter of public record and its distribution is not limited. It also serves to disseminate information to the public as a reporting tool to help citizens assess government operations.

Pat McCarthy, State Auditor

Tat Muchy

Olympia, WA

June 28, 2023

### INDEPENDENT AUDITOR'S REPORT

Report on the Audit of the Financial Statements

### Chehalis School District No. 302 September 1, 2021 through August 31, 2022

Board of Directors Chehalis School District No. 302 Chehalis, Washington

### REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS

### **Unmodified and Adverse Opinions**

We have audited the financial statements of Chehalis School District No. 302, as of and for the year ended August 31, 2022, and the related notes to the financial statements as listed in the financial section of our report.

### **Unmodified Opinion on Regulatory Basis of Accounting (Accounting Manual)**

As described in Note 1 the District has prepared these financial statements to meet the financial reporting requirements of state law and the accounting practices prescribed by the *Accounting Manual for Public School Districts in the State of Washington* (Accounting Manual). Those accounting practices differ from accounting principles generally accepted in the United States of America (GAAP). The differences in these accounting practices are also described in Note 1.

In our opinion, the financial statements referred to above present fairly, in all material respects, the regulatory basis financial position of Chehalis School District No. 302, as of the year ended August 31, 2022, and the regulatory basis of changes in financial position thereof for the year then ended, on the basis of accounting as described in Note 1.

### Adverse Opinion on U.S. GAAP

The financial statements referred to above were not intended to, and in our opinion they do not, present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of Chehalis School District No. 302, as of August 31, 2022, or the changes in financial position or cash flows thereof for the year then ended, because of the significance of the matter discussed below.

### **Basis for Unmodified and Adverse Opinions**

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and *Governmental Auditing Standards*. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the District, and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our unmodified and adverse audit opinions.

### Matter Giving Rise to Adverse Opinion on U.S. GAAP

Auditing standards issued by the American Institute of Certified Public Accountants (AICPA) require auditors to formally acknowledge when governments do not prepare their financial statements, intended for general use, in accordance with GAAP. As described in Note 1 of the financial statements, the government-wide financial statements are prepared by the District in accordance with state law using accounting practices prescribed by the Accounting Manual, which is a basis of accounting other than accounting principles generally accepted in the United States of America. The effects on the financial statements of the variances between the regulatory basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material and pervasive.

### **Matter of Emphasis**

As discussed in Note 1 to the financial statements, in 2022, the District adopted new accounting guidance for presentation and disclosure of leases as required by the Accounting Manual. Our opinion was not modified with respect to this matter.

### Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with the financial reporting provisions of state law and the Accounting Manual described in Note 1. This includes determining that the basis of accounting is acceptable for the presentation of the financial statements in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the District's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

### Auditor's Responsibility for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

Performing an audit in accordance with GAAS and *Government Auditing Standards* includes the following responsibilities:

- Exercise professional judgment and maintain professional skepticism throughout the audit;
- Identify and assess the risks of material misstatement of the financial statements, whether
  due to fraud or error, and design and perform audit procedures responsive to those risks.
   Such procedures include examining, on a test basis, evidence regarding the amounts and
  disclosures in the financial statements;
- Obtain an understanding of internal control relevant to the audit in order to design audit
  procedures that are appropriate in the circumstances, but not for the purpose of expressing
  an opinion on the effectiveness of the District's internal control. Accordingly, no such
  opinion is expressed;
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements;
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the District's ability to continue as a going concern for a reasonable period of time; and
- We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

### **Supplementary Information**

Our audit was conducted for the purpose of forming an opinion on the financial statements taken as a whole. The accompanying Schedule of Expenditures of Federal Awards is presented for purposes of additional analysis as required by Title 2 *U.S. Code of Federal Regulations* (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). The Schedule of Long-Term Liabilities is also presented for

purposes of additional analysis, as required by the prescribed Accounting Manual. These schedules are not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements, and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated, in all material respects, in relation to the financial statements as a whole.

## OTHER REPORTING REQUIRED BY GOVERNMENT AUDITING STANDARDS

In accordance with *Government Auditing Standards*, we have also issued our report dated June 28, 2023 on our consideration of the District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the District's internal control over financial reporting and compliance.

Pat McCarthy, State Auditor

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Olympia, WA

June 28, 2023

### FINANCIAL SECTION

### Chehalis School District No. 302 September 1, 2021 through August 31, 2022

### FINANCIAL STATEMENTS

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Schedule of Expenditures of Federal Awards – 2022

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## Balance Sheet - Governmental Funds

August 31, 2022

	General Fund	ASB Fund	Debt Service Fund	Capital Projects Fund	Transportation Vehicle Fund	Permanent Fund	Total
Assets							
Cash and Cash Equivalents	807,952.10	16,376.86	00.00	73,127.24	00.00	00.00	897,456.20
Minus Warrants Outstanding	-738,939.25	-90.00	00.00	-68,127.24	00.00	00.00	-807,156.49
Taxes Receivable	2,391,744.03		949,759.11	00.00	00.00		3,341,503.14
Due From Other Funds	00.00	00.00	00.00	00.00	00.00	00.00	00.00
Due From Other Governmental Units	784,047.31	00.00	00.0	00.00	00.00	00.0	784,047.31
Accounts Receivable	100,108.25	00.00	00.00	00.00	00.00	00.00	100,108.25
Interfund Loans Receivable	00.00			00.00			00.00
Accrued Interest Receivable	00.0	00.00	00.00	00.0	00.00	00.0	0.00
Inventory	4,383.56	00.00		00.00			4,383.56
Prepaid Items	00.00	00.00			00.00	00.00	00.00
Investments	6,342,560.35	296,488.69	1,069,381.00	1,719,370.22	133,967.04	00.00	9,561,767.30
Investments/Cash With Trustee	324,572.84		00.0	00.0	00.00	00.0	324,572.84
Investments-Deferred Compensation	0.00			00.0			00.00
Self-Insurance Security Deposit	0.00						00.00
TOTAL ASSETS	10,016,429.19	312,775.55	2,019,140.11	1,724,370.22	133,967.04	00.0	14,206,682.11
DEFERRED OUTFLOWS OF RESOURCES:							
Deferred Outflows of Resources - Other	00.00	00.00	00.0	00.00	00.00	00.0	00.00
TOTAL DEFERRED OUTFLOWS OF RESOURCES	00.0	00.0	00.0	00.0	00.0	00.0	00.0
TOTAL ASSETS AND DEFERRED OUTFLOWS OF RESOURCES	10,016,429.19	312,775.55	2,019,140.11	1,724,370.22	133,967.04	0.00	14,206,682.11
LIABILITIES							
Accounts Payable	639,682.29	10,935.50	00.00	36,082.01	00.00	00.00	686,699.80
Contracts Payable Current	00.0	00.00		00.00	00.00	00.00	00.00
Accrued Interest Payable			00.00				00.00

The accompanying notes are an integral part of this financial statement.

Chehalis School District No. 302

## Balance Sheet - Governmental Funds

August 31, 2022

	General Fund	ASB Fund	Debt Service Fund	Capital Projects Fund	Transportation Vehicle Fund	Permanent Fund	Total
Accrued Salaries	51,000.00	00.00		00.00			51,000.00
Anticipation Notes Payable	00.00		00.00	00.00	00.0		00.00
LIABILITIES:							
Payroll Deductions and Taxes Payable	25,210.95	00.0		0.00			25,210.95
Due To Other Governmental Units	205,059.16	00.00		0.00	00.00	00.0	205,059.16
Deferred Compensation Payable	0.00			0.00			00.0
Estimated Employee Benefits Payable	00.00						00.0
Due To Other Funds	00.00	00.00	00.00	00.00	00.0	00.00	00.00
Interfund Loans Payable	00.0		00.00	00.00	00.0		00.00
Deposits	00.00	00.00		00.00			00.00
Unearned Revenue	00.00	00.00	00.00	00.00	00.0		00.00
Matured Bonds Payable			00.0				00.00
Matured Bond Interest Payable			00.0				00.0
Arbitrage Rebate Payable	00.0		00.00	00.00	00.0		00.00
TOTAL LIABILITIES	920,952.40	10,935.50	00.0	36,082.01	00.0	00.0	967,969.91
DEFERRED INFLOWS OF RESOURCES							
Unavailable Revenue	97,744.93	82,810.62	00.00	00.00	00.0	00.00	180,555.55
Unavailable Revenue - Taxes Receivable	2,391,744.03		949,759.11	0.00	00.0		3,341,503.14
TOTAL DEFERRED INFLOWS OF RESOURCES	2,489,488.96	82,810.62	949,759.11	0.00	00.0	00.0	3,522,058.69
FUND BALANCE:							
Nonspendable Fund Balance	4,383.56	00.00	00.00	00.00	00.0	00.00	4,383.56
Restricted Fund Balance	1,570,992.65	219,029.43	1,065,181.00	00.00	133,967.04	00.00	2,989,170.12
Committed Fund Balance	00.0	00.00	00.00	00.00	00.0	00.00	00.00
Assigned Fund Balance	4,016,232.54	00.0	4,200.00	1,688,288.21	00.0	00.00	5,708,720.75

The accompanying notes are an integral part of this financial statement.

## Balance Sheet - Governmental Funds

August 31, 2022

Total	1,014,379.08	9,716,653.51	14,206,682.11
Permanent Fund	00.00	00.0	00.00
Transportation Vehicle Fund	00.0	133,967.04	133,967.04
Capital Projects Fund	00.0	1,688,288.21	1,724,370.22
Debt Service Fund	00.00	1,069,381.00	2,019,140.11
ASB Fund	00.0	219,029.43	312,775.55
General Fund	1,014,379.08	6,605,987.83	10,016,429.19
	Unassigned Fund Balance	TOTAL FUND BALANCE	TOTAL LIABILITIES, DEFERRED INFLOW OF RESOURCES, AND FUND BALANCE

The accompanying notes are an integral part of this financial statement.

Chehalis School District No. 302

Statement of Revenues, Expenditures, and Changes in Fund Balance - Governmental Funds

For the Year Ended August 31, 2022

	General Fund	ASB Fund	Debt Service Fund	Capital Projects Fund	Transportation Vehicle Fund	Permanent Fund	Total
REVENUES:							
Local	5,686,825.81	441,096.36	2,173,307.47	9,221.97	321.01		8,310,772.62
State	35,219,345.11		00.00	00.00	99,058.88		35,318,403.99
Federal	8,891,431.18		00.00	334,886.12	00.00		9,226,317.30
Other	1,298,342.45			00.00	00.00	00.00	1,298,342.45
TOTAL REVENUES	51,095,944.55	441,096.36	2,173,307.47	344,108.09	99,379.89	00.00	54,153,836.36
EXPENDITURES:							
CURRENT:							
Regular Instruction	23,843,704.82						23,843,704.82
Special Education	6,804,420.47						6,804,420.47
Vocational Education	1,538,380.39						1,538,380.39
Skill Center	00.00						00.0
Compensatory Programs	6,175,401.59						6,175,401.59
Other Instructional Programs	83,087.69						83,087.69
Federal Stimulus COVID-19	1,164,789.70						1,164,789.70
Community Services	108,442.91						108,442.91
Support Services	9,247,157.24						9,247,157.24
Student Activities/Other		371,444.13				00.00	371,444.13
CAPITAL OUTLAY:							
Sites				79,461.34			79,461.34
Building				432,328.81			432,328.81
Equipment				126,408.04			126,408.04
Instructional Technology				0.00			00.00
Energy				0.00			00.00
Transportation Equipment					234,286.99		234,286.99
Sales and Lease				2,191.05			2,191.05
Other	1,935,394.43						1,935,394.43
DEBT SERVICE:							
Principal	49,783.72		769,750.11	0.00	00.00		819,533.83

The accompanying notes are an integral part of this financial statement.

Chehalis School District No. 302

Statement of Revenues, Expenditures, and Changes in Fund Balance - Governmental Funds

For the Year Ended August 31, 2022

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	General Fund	ASB Fund	Service Fund	Capicai Projects Fund	ramsporcacion Vehicle Fund	Permanent Fund	Total
Interest and Other Charges	8,683.98		1,428,240.91	00.0	00.00		1,436,924.89
Bond/Levy Issuance				0.00	00.00		00.00
TOTAL EXPENDITURES	50,959,246.94	371,444.13	2,197,991.02	640,389.24	234,286.99	00.00	54,403,358.32
REVENUES OVER (UNDER) EXPENDITURES	136,697.61	69,652.23	-24,683.55	-296,281.15	-134,907.10	00.00	-249,521.96
OTHER FINANCING SOURCES (USES):							
Bond Sales & Refunding Bond Sales	00.00		00.00	0.00	00.0		00.00
Long-Term Financing	225,407.06			00.0	234,071.45		459,478.51
Transfers In	00.0		102,384.76	00.0	00.00		102,384.76
Transfers Out (GL 536)	00.0		00.00	00.0	-102,384.76	00.00	-102,384.76
Other Financing Uses (GL 535)	00.0		00.00	00.00	00.00		00.00
Other	00.00		00.00	1,066,154.88	00.00		1,066,154.88
TOTAL OTHER FINANCING SOURCES (USES)	225,407.06		102,384.76	1,066,154.88	131,686.69	00.00	1,525,633.39
EXCESS OF REVENUES/OTHER FINANCING SOURCES OVER (UNDER) EXPENDITURES AND OTHER FINANCING USES	362,104.67	69,652.23	77,701.21	769,873.73	-3,220.41	00.0	1,276,111.43
BEGINNING TOTAL FUND BALANCE	6,202,570.52	149,377.20	991,679.79	918,414.48	137,187.45	00.00	8,399,229.44
Prior Year(s) Corrections or Restatements	41,312.64	0.00	00.0	0.00	0.00	00.0	41,312.64
ENDING TOTAL FUND BALANCE	6,605,987.83	219,029.43	1,069,381.00	1,688,288.21	133,967.04	00.00	9,716,653.51

The accompanying notes are an integral part of this financial statement.

## Statement of Fiduciary Net Position

August 31, 2022

	Custodial Funds	Private Purpose Trust
ASSETS:		
Imprest Cash	00.0	00.00
Cash On Hand	00.00	00.00
Cash On Deposit with Cty Treas	1,000.00	3,000.00
Minus Warrants Outstanding	-1,000.00	-3,000.00
Due From Other Governmental Units	00.00	00.00
Accounts Receivable	00.00	00.00
Accrued Interest Receivable	00.00	00.00
Investments	251,279.41	827,670.36
Investments/Cash With Trustee	00.00	00.00
Other Assets	00.00	00.00
Capital Assets, Land	00.00	00.00
Capital Assets, Buildings	00.00	00.00
Capital Assets, Equipment	00.00	00.00
Accum Depreciation, Buildings	00.00	00.00
Accum Depreciation, Equipment	00.00	00.00
TOTAL ASSETS	251,279.41	827,670.36
LIABILITIES:		
Accounts Payable	1,500.00	2,000.00
Due To Other Governmental Units	00.00	00.00
TOTAL LIABILITIES	1,500.00	2,000.00
NET POSITION:		
Restricted for:		
Restricted For Intact Trust Principal	61,127.45	589,830.48
Restricted for Individuals, Organizations, and Other Governments - CF	188,651.96	

The accompanying notes are an integral part of this financial statement.

Restricted for Individuals, Organizations, and Other Governments - PPT

Restricted For Other Purposes

TOTAL NET POSITION

235,839.88

0.00

825,670.36

# Statement of Changes in Fiduciary Net Position

For the Year Ended August 31, 2022

	Custodial Funds	Private Purpose Trust
ADDITIONS:		
Contributions:		
Private Donations	18,001.05	60,550.00
Employer		00.00
Members		00.00
Other	00.00	00.00
TOTAL CONTRIBUTIONS	18,001.05	60,550.00
Investment Income:		
Net Appreciation (Depreciation) in Fair Value	00.0	00.00
Interest and Dividends	2,851.70	4,458.16
Less Investment Expenses	00.0	00.00
Net Investment Income	2,851.70	4,458.16
Other Additions:		
Rent or Lease Revenue	00.0	00.00
Total Other Additions	0.00	00.00
TOTAL ADDITIONS	20,852.75	65,008.16
DEDUCTIONS:		
Benefits		23,960.00
Refund of Contributions	65,068.85	00.00
Administrative Expenses	00.0	00.00
Scholarships	18,500.00	
Other	0.00	00.00
TOTAL DEDUCTIONS	83,568.85	23,960.00
Net Increase (Decrease)	-62,716.10	41,048.16
Net Position - Beginning Balance	312,495.51	784,622.20
Prior Year(s) Corrections or Restatements	00.0	00.00
NET POSITIONENDING	249,779.41	825,670.36

The accompanying notes are an integral part of this financial statement.

### CHEHALIS SCHOOL DISTRICT #302

### **NOTES TO THE FINANCIAL STATEMENTS**

September 1, 2021 Through August 31, 2022

### **NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

The Chehalis School District is a municipal corporation organized pursuant to Title 28A of the Revised Code of Washington (RCW) for the purposes of providing public school services to students in grades K–12. Oversight responsibility for the District's operations is vested with the independently elected board of directors. Management of the District is appointed by and is accountable to the board of directors. Fiscal responsibility, including budget authority and the power to set fees, levy property taxes, and issue debt consistent with provisions of state statutes, also rests with the board of directors.

The District presents governmental fund financial statements and related notes on the modified accrual basis of accounting in accordance with the *Accounting Manual for Public School Districts in the State of Washington*, issued jointly by the State Auditor's Office and the Superintendent of Public Instruction by the authority of RCW 43.09.200, RCW 28A.505.140, RCW 28A.505.010(1) and RCW 28A.505.020. This manual prescribes a financial reporting framework that differs from generally accepted accounting principles (GAAP) in the following manner:

- (1) Districtwide statements, as defined in GAAP, are not presented.
- (2) A Schedule of Long-Term Liabilities is presented as supplementary information.
- (3) Supplementary information required by GAAP is not presented.
- (4) Property Taxes collected after the end of the fiscal period are not considered available for revenue accrual as described below.

### **Fund Accounting**

Financial transactions of the District are reported in individual funds. Each fund uses a separate set of self-balancing accounts that comprise its assets, liabilities, fund equity, revenues, and expenditures (or expenses) as appropriate. All funds are considered major funds. The various funds in the report are grouped into governmental (and fiduciary) funds as follows:

### **Governmental Funds**

### **General Fund**

This fund is used to account for all expendable financial resources, except for those that are required to be accounted for in another fund. In keeping with the principle of having as few

funds as are necessary, activities such as food services, maintenance, data processing, printing, and student transportation are included in the General Fund.

#### Capital Projects Funds

These funds account for financial resources that are to be used for the construction or acquisition of major capital assets. There are two funds that are considered to be of the capital projects fund type: the Capital Projects Fund and the Transportation Vehicle Fund.

<u>Capital Projects Fund</u>. This fund is used to account for resources set aside for the acquisition and construction of major capital assets such as land and buildings.

<u>Transportation Vehicle Fund</u>. This fund is used to account for the purchase, major repair, rebuilding, and debt service expenditures that relate to pupil transportation equipment.

#### **Debt Service Fund**

This fund is used to account for the accumulation of resources for and the payment of matured general long-term debt principal and interest.

#### Special Revenue Fund

In Washington state, the only allowable special revenue fund for school districts is the Associated Student Body (ASB) Fund. This fund is accounted for in the District's financial statements as the financial resources legally belong to the District. As a special revenue fund, amounts within the ASB Fund may only be used for those purposes that relate to the operation of the Associated Student Body of the District.

#### Permanent Funds

These funds are used to report resources that are legally restricted such that only earnings, and not principal, may be expended. Amounts in the Permanent Fund may only be spent in support of the District's programs and may not be used to the benefit of any individual.

#### **Fiduciary Funds**

Fiduciary funds include pension and other employee benefit trust funds, private-purpose trust funds, and custodial funds, and are used to account for assets that are held by the District in a fiduciary capacity.

## Private-Purpose Trust Fund

This fund is used to account for resources that are legally held in trust by the District. The trust agreement details whether principal and interest may both be spent, or whether only interest may be spent. Money from a Private-Purpose Trust Fund may not be used to support the District's programs, and may be used to benefit individuals, private organizations, or other governments.

#### **Custodial Funds**

These funds are used to account for assets that the District holds on behalf of others in a purely custodial capacity.

# Measurement focus, basis of accounting, and fund financial statement presentation

Governmental fund financial statements are reported using the current financial resources measurement focus and the modified accrual basis of accounting. Revenues are recognized as soon as they are measurable and available. Revenues are considered "measurable" if the amount of the transaction can be readily determined. Revenues are considered "available" when they are collectible within the current period or soon enough thereafter to pay liabilities of the current period. For this purpose, the District considers revenues to be available if they are collected within 60 days after year-end. Categorical program claims and interdistrict billings are measurable and available and are accrued. Property taxes not collected by the fiscal year end are measurable and recorded as a receivable, however the receivable is not considered available revenue and is recorded as a deferred inflow of resources.

Expenditures are recognized under the modified accrual basis of accounting when the related fund liability is incurred, except for unmatured principal and interest on long-term debt which are recorded when due. Purchases of capital assets are expensed during the year of acquisition. For federal grants, the recognition of expenditures is dependent on the obligation date. Obligation means a purchase order has been issued, contracts have been awarded, or goods and/or services have been received.

#### **Budgets**

Chapter 28A.505 RCW and Chapter 392-123 Washington Administrative Code (WAC) mandate school district budget policies and procedures. The board adopts annual appropriated budgets for all governmental funds. These budgets are appropriated at the fund level. The budget

constitutes the legal authority for expenditures at that level. Appropriations lapse at the end of the fiscal period.

Budgets are adopted on the same modified accrual basis as used for financial reporting. Fund balance is budgeted as available resources and, under statute, may not be negative, unless the District enters into binding conditions with state oversight pursuant to RCW 28A.505.110.

The government's policy regarding whether to first apply restricted or unrestricted resources when an expense is incurred for purposes for which both restricted and unrestricted net assets are available.

The District receives state funding for specific categorical education-related programs. Amounts that are received for these programs that are not used in the current fiscal year may be carried forward into the subsequent fiscal year, where they may be used only for the same purpose as they were originally received. When the District has such carryover, those funds are expended before any amounts received in the current year are expended.

Additionally, the District has other restrictions placed on its financial resources. When expenditures are recorded for purposes for which a restriction or commitment of fund balance is available, those funds that are restricted or committed to that purpose are considered first before any unrestricted or unassigned amounts are expended.

## The government's fund balance classifications policies and procedures.

The District classifies ending fund balance for its governmental funds into five categories.

<u>Nonspendable Fund Balance</u>. The amounts reported as Nonspendable are resources of the District that are not in spendable format. They are either non-liquid resources such as inventory or prepaid items, or the resources are legally or contractually required to be maintained intact.

<u>Restricted Fund Balance</u>. Amounts that are reported as Restricted are those resources of the District that have had a legal restriction placed on their use either from statute, WAC, or other legal requirements that are beyond the control of the board of directors. Restricted fund balance includes anticipated recovery of revenues that have been received but are restricted as to their usage.

<u>Committed Fund Balance</u>. Amounts that are reported as Committed are those resources of the District that have had a limitation placed upon their usage by formal action of the District's board of directors. Commitments are made either through a formal adopted board resolution or are related to a school board policy. Commitments may only be changed when the resources are used for the intended purpose or the limitation is removed by a subsequent formal action of the board of directors.

<u>Assigned Fund Balance</u>. In the General Fund, amounts that are reported as Assigned are those resources that the District has set aside for specific purposes. These accounts reflect tentative management plans for future financial resource use such as the replacement of equipment or the assignment of resources for contingencies. Assignments reduce the amount reported as Unassigned Fund Balance, but may not reduce that balance below zero.

In other governmental funds, Assigned fund balance represents a positive ending spendable fund balance once all restrictions and commitments are considered. These resources are only available for expenditure in that fund and may not be used in any other fund without formal action by the District's board of directors and as allowed by statute.

The Superintendent and Director of Business and Operations are the only persons who have the authority to create Assignments of fund balance.

<u>Unassigned Fund Balance</u>. In the General Fund, amounts that are reported as Unassigned are those net spendable resources of the District that are not otherwise Restricted, Committed, or Assigned, and may be used for any purpose within the General Fund.

In other governmental funds, Unassigned fund balance represents a deficit ending spendable fund balance once all restrictions and commitments are considered.

A negative Unassigned fund balance means that the legal restrictions and formal commitments of the District exceed its currently available resources.

## **Cash and Cash Equivalents**

All of the District's cash and cash equivalents are considered to be cash on hand, demand deposits, and short-term investments with original maturities of three months or less from the date of acquisition.

## Inventory

Inventory is valued at cost using the first-in, first-out (FIFO) method. The consumption method of inventory is used, which charges inventory as an expenditure when it is consumed. A portion of fund balance, representing inventory, is considered Nonspendable. USDA commodity inventory consists of food donated by the United States Department of Agriculture. It is valued at the prices paid by the USDA for the commodities.

### **Accounting and Reporting Changes**

#### Leases

For the year ended August 31, 2022, the district implemented guidance for the presentation and disclosures of leases, as required by the School District Accounting Manual. These changes were in response to the provisions of GASB Statement No. 87.

As a result, the impact to the district of the adoption of the new lease requirements includes:

- Lease receivables and Deferred Inflows for leases where the District is a lessor are presented on the Balance Sheet.
- Beginning balances for lease liabilities presented on the Schedule of Long-Term Liabilities have been restated to reflect implementation of these requirements.

Information regarding the District's leases are presented in the Leases note, as applicable.

## **NOTE 2: DEPOSITS AND INVESTMENTS**

All of the District's bank balances are insured by the Federal Depository Insurance Corporation (FDIC) or by collateral held in a multiple financial institution collateral pool administered by the Washington Public Deposit Protection Commission (PDPC).

Statutes authorize the District to invest in (1) securities, certificates, notes, bonds, short-term securities, or other obligations of the United States, and (2) deposits in any state bank or trust company, national banking association, stock savings bank, mutual savings bank, savings and loan association, and any branch bank engaged in banking in the state in accordance with RCW 30.04.300 if the institution has been approved by the Public Deposit Protection Commission to hold public deposits and has segregated eligible collateral having a value of not less than its maximum liability.

The Lewis County Treasurer is the *ex officio* treasurer for the District and holds all accounts of the District. The District directs the County Treasurer to invest those financial resources of the District that the District has determined are not needed to meet the current financial obligations of the District.

The district's deposits and certificates of deposit are mostly covered by federal depository insurance (FDIC) or by collateral held in a multiple financial institution collateral pool administered by the Washington Public Deposit Protection Commission (PDPC). All of the District's investments during the year and at year-end were insured or registered and held by the District or its agent in the District's name.

Washington State statutes authorize the district to invest in the following types of securities:

- Certificates, notes, or bonds of the United States, its agencies, or any corporation wholly owned by the government of the United States,
- Obligations of government-sponsored corporations which are eligible as collateral for advances to member banks as determined by the Board of Governors of the Federal Reserve System,
- Bankers' acceptances purchased on the secondary market,
- Repurchase agreements for securities listed in the three items above, provided that the transaction is structured so that the public treasurer obtains control over the underlying securities,
- Investment deposits with qualified public depositories,
- Washington State Local Government Investment Pool, and
- County Treasurer Investment Pools.

The District's investments as of August 31, 2022, are as follows:

		Investments held by	
		District as an agent	
	District's own	for other	
Type of Investment	investments	organizations	Total
State Treasurer's			
Investment Pool	\$9,561,767.30	\$1,078,949.77	\$10,640,717.07
Total	\$9,561,767.30	\$1,078,949.77	\$10,640,717.07

## **NOTE 3: SIGNIFICANT CONTINGENT LIABILITIES**

## Litigation

The District has no legal obligations that would materially impact the financial position of the District.

## **NOTE 4: SIGNIFICANT EFFECTS OF SUBSEQUENT EVENTS**

#### **COVID-19 Pandemic**

In February 2020, Governor Inslee declared a state of emergency in response to the spread of a deadly new virus. In the weeks following the declaration, precautionary measures to slow the spread of the virus were ordered. These measures included closing schools, canceling public events, limiting gathering sizes, and requiring people to stay home unless they were leaving for an essential function. On April 6, 2020, the Governor closed all public and private K–12 school buildings throughout the remainder of the 2019–20 school year and continuing through the 2020-21 school year. The virus is commonly referred to as Covid-19.

The Chehalis School District opened with an in-person, 5 days a week, business as usual learning model to begin the 2021-2022 school year and has been able to sustain this model through the current period, mid-January 2023, without closing or modification. Resuming an in-person learning model allowed the District's typical activities, including ASB and extracurricular activities to resume. The District's 2021-2022 basic education enrollment full time equivalent (FTE) ended 95.74 below budgeted enrollment. The District's 2022-2023 budget includes 110 fewer basic enrollment FTE than its 2021-2022 budget included. Through January 2023, the District has averaged 25.81 FTE above its 2022-2023 budget.

The full impact of Covid-19 on the Chehalis School District is unknown and cannot be estimated at this time. However, the District has taken steps to mitigate negative impacts by reopening school as soon as was determined to be safe and continues to budget conservatively and make reductions as appropriate.

The District's 2021-2022 financial statements include the impacts of the loss of revenue due to enrollment as well as Covid-19 related funding received and expended. The District reported \$2,866,118.57 of Covid-19 related distorting items. This includes one-time large capital purchases.

## **NOTE 5: PENSION PLANS**

#### **General Information**

The Washington State Department of Retirement Systems (DRS), a department within the primary government of the state of Washington, prepares a stand-alone annual comprehensive financial report that includes financial statements and required supplementary information for each pension plan. The pension plan's basic financial statement is accounted for using the accrual basis of accounting. The measurement date of the pension plans is June 30. Benefit payments (including refunds of employee contributions) are recognized when due and payable in accordance with the benefit terms. Investments are reported at fair value.

The school district is reporting the net pension liability in the notes and on the Schedule of Long-term Liabilities calculated as the district's proportionate allocation percentage multiplied by the total plan collective net pension liability. The DRS total collective net pension liabilities for the pension plans school districts participate in are shown here.

## The Collective Net Pension Liability (Asset)

The collective net pension liability or asset for the pension plans districts participated in are reported in the following tables

The Collective Net Pension Liability or (Asset) as of June 30, 2022					
	Total Pension Liability	Plan fiduciary net position	Participating employers' net pension liability or (Asset)	Plan fiduciary net position as a percentage of the total pension liability	
PERS 1	11,877,621,000	9,093,254,000	2,784,367,000	76.56%	
SERS 2/3	8,478,821,000	8,747,471,000	(268,650,000)	103.17%	
TRS 1	8,739,146,000	6,837,316,000	1,901,830,000	78.24%	
TRS 2/3	22,946,845,000	23,143,631,000	(196,786,000)	100.86%	

Detailed information about the pension plans' fiduciary net position is available in the separately issued DRS report. Copies of the report may be obtained by contacting the Washington State Department of Retirement Systems, P.O. Box 48380, Olympia, WA 98504-8380; or online at Annual Financial Reports or http://www.drs.wa.gov./administrations/annual-report.

#### **Membership Participation**

Substantially all school district full-time and qualifying part-time employees participate in one of the following three contributory, multi-employer, cost-sharing statewide retirement systems managed by DRS: Teachers' Retirement System (TRS), Public Employees' Retirement System (PERS) and School Employees' Retirement System (SERS).

Membership participation by retirement plan as of June 30, 2022, was as follows:

Plan	Retirees and Beneficiaries Receiving Benefits	Inactive Plan Members Entitled to but not yet Receiving Benefits	Active Plan Members
PERS 1	41,154	196	632
SERS 2	13,480	7,186	33,622
SERS 3	13,819	9,896	31,861
TRS 1	29,731	63	111
TRS 2	7,026	3,428	27,202
TRS 3	18,956	8,681	54,336

#### **Membership & Plan Benefits**

Certificated employees are members of TRS. Classified employees are members of PERS (if Plan 1) or SERS. Plan 1 under the TRS and PERS programs are defined benefit pension plans whose members joined the system on or before September 30, 1977. TRS 1 and PERS 1 are closed to new entrants.

#### TRS Plan Information

TRS was established in 1938, and its retirement provisions are contained in RCW Chapters 41.34 and 41.32. TRS is a cost-sharing multi-employer retirement system comprised of three separate plans for membership purposes: Plans 1 and 2 are defined benefit plans and Plan 3 is a defined benefit plan with a defined contribution component. TRS eligibility for membership requires service as a certificated, public school employee working in an instructional, administrative or supervisory capacity.

TRS is comprised of three separate plans for accounting purposes: Plan 1, Plan 2/3, and Plan 3. Plan 1 accounts for the defined benefits of Plan 1 members. Plan 2/3 accounts for the defined benefits of Plan 2 members and the defined benefit portion of benefits for Plan 3 members. Plan 3 accounts for the defined contribution portion of benefits for Plan 3 members. Although members can only be a member of either Plan 2 or Plan 3, the defined benefit portions of Plan 2 and Plan 3 are accounted for in the same pension trust fund. All assets of this Plan 2/3 defined benefit plan may legally be used to pay the defined benefits of any of the Plan 2 or Plan 3 members or beneficiaries, as defined by the terms of the plan. Therefore, Plan 2/3 is considered to be a single plan for accounting purposes.

TRS Plan 1 provides retirement, disability and death benefits. TRS 1 members were vested after the completion of five years of eligible service. Retirement benefits are determined as two percent of the average final compensation (AFC), for each year of service credit, up to a maximum of 60 percent, divided by twelve. The AFC is the total earnable compensation for the two consecutive highest-paid fiscal years, divided by two. Members are eligible for retirement at any age after 30 years of service, or at the age of 60 with five years of service, or at the age of 55 with 25 years of service. Other benefits include temporary and permanent

disability payments, an optional cost-of-living adjustment (COLA), and a one-time duty-related death benefit, if found eligible by the Department of Labor and Industries.

TRS Plan 2/3 provides retirement, disability and death benefits. Retirement benefits are determined as two percent of the average final compensation (AFC) per year of service for Plan 2 members and one percent of AFC for Plan 3 members. The AFC is the monthly average of the 60 consecutive highest-paid service credit months. There is no cap on years of service credit. Members are eligible for normal retirement at the age of 65 with at least five years of service credit. Retirement before age 65 is considered an early retirement. TRS Plan 2/3 members, who have at least 20 years of service credit and are 55 years of age or older, are eligible for early retirement with a reduced benefit.

The benefit is reduced by a factor that varies according to age, for each year before age 65. TRS Plan 2/3 members who have 30 or more years of service credit, were hired prior to May 1, 2013, and are at least 55 years old, can retire under one of two provisions: With a benefit that is reduced by three percent for each year before age 65; or with a benefit that has a smaller (or no) reduction (depending on age) that imposes stricter return-to-work rules. TRS Plan 2/3 members hired on or after May 1, 2013, have the option to retire early by accepting a reduction of five percent for each year of retirement before age 65. This option is available only to those who are age 55 or older and have at least 30 years of service. TRS Plan 2/3 retirement benefits are also actuarially reduced to reflect the choice of a survivor benefit. Other benefits include duty and non-duty disability payments, a cost-of-living allowance (based on the Consumer Price Index), capped at three percent annually and a one-time duty-related death benefit, if found eligible by the Department of Labor and Industries.

#### **PERS Plan Information**

PERS was established in 1947, and its retirement benefit provisions are contained in RCW Chapters 41.34 and 41.40. PERS is a cost-sharing, multi-employer retirement system. PERS Plan 1 provides retirement, disability and death benefits. PERS 1 members were vested after the completion of five years of eligible service. Retirement benefits are determined as two percent of the member's average final compensation (AFC) times the member's years of service. The AFC is the average of the member's 24 highest consecutive service months. Members are eligible for retirement from active status at any age with at least 30 years of service, at age 55 with at least 25 years of service, or at age 60 with at least five years of service.

Members retiring from inactive status prior to the age of 65 may receive actuarially reduced benefits. PERS Plan 1 retirement benefits are actuarially reduced to reflect the choice of a survivor benefit. Other benefits include duty and non-duty disability payments, an optional cost-of-living adjustment (COLA), and a one-time duty-related death benefit, if found eligible by the Department of Labor and Industries.

#### **SERS Plan Information**

SERS was established by the legislature in 1998, and the plan became effective in 2000. SERS retirement benefit provisions are established in RCW Chapters 41.34 and 41.35. SERS is a cost-sharing, multiemployer retirement system comprised of two separate plans for membership purposes. SERS Plan 2 is a defined benefit plan and SERS Plan 3 is a defined benefit plan with a defined contribution component. SERS members include classified employees of school districts and educational service districts.

SERS is reported as two separate plans for accounting purposes: Plan 2/3 and Plan 3. Plan 2/3 accounts for the defined benefits of Plan 2 members and the defined benefit portion of benefits for Plan 3 members. Plan 3 accounts for the defined contribution portion of benefits for Plan 3 members. Although members can only be a member of either Plan 2 or Plan 3, the defined benefit portions of Plan 2 and Plan 3 are accounted for in the same pension trust fund. All assets of this Plan 2/3 defined benefit plan may legally be used to pay the defined benefits of any of the Plan 2 or Plan 3 members or beneficiaries. Therefore, Plan 2/3 is considered to be a single plan for accounting purposes.

SERS provides retirement, disability and death benefits. Retirement benefits are determined as two percent of the member's average final compensation (AFC) times the member's years of service for Plan 2 and one percent of AFC for Plan 3. The AFC is the monthly average of the member's 60 highest-paid consecutive service months before retirement, termination or death. There is no cap on years of service credit. Members are eligible for retirement with a full benefit at 65 with at least five years of service credit. Retirement before age 65 is considered an early retirement. SERS members, who have at least 20 years of service credit and are 55 years of age or older, are eligible for early retirement with a reduced benefit.

The benefit is reduced by a factor that varies according to age, for each year before age 65. SERS members who have 30 or more years of service credit and are at least 55 years old can retire under one of two provisions, if hired prior to May 2, 2013: With a benefit that is reduced by three percent for each year before age 65; or with a benefit that has a smaller (or no) reduction (depending on age) that imposes stricter return-to-work rules. SERS members hired on or after May 1, 2013, have the option to retire early by accepting a reduction of five percent for each year of retirement before age 65. This option is available only to those who are age 55 or older and have at least 30 years of service. SERS retirement benefits are also actuarially reduced to reflect the choice of a survivor benefit. Other benefits include duty and non-duty disability payments, a cost- of-living allowance (based on the Consumer Price Index), capped at three percent annually and a one-time duty-related death benefit, if found eligible by the Department of Labor and Industries.

#### **Plan Contributions**

The employer contribution rates for PERS, TRS, and SERS (Plans 1, 2, and 3) and the TRS and SERS Plan 2 employee contribution rates are established by the Pension Funding Council based

upon the rates set by the Legislature. The methods used to determine the contribution requirements are established under chapters 41.34 and 41.40 RCW for PERS, 41.34 and 41.35 RCW for SERS, and 41.32 and 41.34 RCW for TRS. Employers do not contribute to the defined contribution portions of TRS Plan 3 or SERS Plan 3. Under current law the employer must contribute 100 percent of the employer-required contribution. The employee contribution rate for Plan 1 in PERS and TRS is set by statute at six percent and does not vary from year to year.

The employer and employee contribution rates for all plans were effective as of September 1, 2021. PERS contribution rates changed on July 1, 2021. Contribution rates for TRS and SERS plans changed on September 1, 2021. The pension plan contribution rates (expressed as a percentage of covered payroll) for fiscal year 2022 are listed below:

	From this date	Through this date	Member rate	Employer rate	
PERS 1	7/1/2021	8/31/2022	6.00%	10.25%	
TRS 1	9/1/2021	8/31/2022	6.00%	14.42%	
TRS 2	9/1/2021	8/31/2022	8.05%	14.42%	
TRS 3	9/1/2021	8/31/2022	*	14.42%	**
SERS 2	9/1/2021	8/31/2022	7.76%	11.65%	
SERS 3	9/1/2021	8/31/2022	*	11.65%	**

Note: The Employer rates include .0018 DRS administrative expense.

## The School District's Proportionate Share of the Net Pension Liability (Asset)

At June 30, 2022, the school district reported a total liability of \$6,221,852 for its proportionate shares of the individual plans' collective net pension liability and \$1,153,670 for its proportionate shares of net pension assets. Proportions of net pension amounts are based on annual contributions for each of the employers participating in the DRS administered plans. At June 30, 2022 the district's proportionate share of each plan's net pension liability is reported below:

<sup>\* –</sup> TRS and SERS Plan 3 Employee Contribution Variable from 5% to 15% based on rate selected by the employee member.

<sup>\*\* –</sup> TRS and SERS Plan 2/3 Employer Contributions for defined benefit portion only.

June 30, 2022	PERS 1	SERS 2/3	TRS 1	TRS 2/3
District's Annual	276 001	E42 E12	1 220 224	1 622 240
Contributions	276,991	542,513	1,339,224	1,633,240
Proportionate Share				
of the Net Pension	1,258,428	(651,183)	4,963,424	(502,487)
Liability (Asset)				

At June 30, 2022, the school district's percentage of the proportionate share of the collective net pension amount was as follows and the change in the allocation percentage from the prior period is illustrated below.

Change in Proportionate Shares	PERS 1	SERS 2/3	TRS 1	TRS 2/3
Current year proportionate share	0.045196%	0.242391%	0.260981%	0.255347%
Prior year proportionate share	0.040871%	0.241009%	0.267008%	0.258633%
Net difference percentage	0.004325%	0.001382%	-0.006027%	-0.003286%

## **Actuarial Assumptions**

The total pension liabilities for TRS 1, TRS 2/3, PERS 1 and SERS 2/3 were determined by actuarial valuation as of June 30, 2021, with the results rolled forward to June 30, 2022, using the following actuarial assumptions, applied to all prior periods included in the measurement:

Inflation	2.75% total economic inflation, 3.25% salary inflation
Salary increases	In addition to the base 3.25% salary inflation assumption, salaries
	are also expected to grow by promotions and longevity.
Investment rate of return	7.00%

#### Mortality Rates

Mortality rates used in the plans were developed using the Society of Actuaries' Pub.H-2010 Mortality rates, which vary by member status as the base table. OSA applies age offsets for each system to better tailor the mortality rates to the demographics of each plan. OSA applied the long-term MP-2017 generational improvement scale to project mortality rates for every year after the 2010 base table. The actuarial assumptions used in the June 30, 2021, valuation were based on the results of the 2013–2018 Demographic Experience Study Report and the 2021 Economic Experience Study. Additional assumptions for subsequent events and law changes are current as of the 2021 actuarial valuation report.

#### Long-term Expected Rate of Return

OSA selected a 7.00% long-term expected rate of return on pension plan investments using a building-block method. In selecting the assumptions, OSA reviewed the historical experience

data, considered the historical conditions that produced past annual investment returns, and considered Capital Market Assumptions (CMAs) and simulated expected investment returns the Washington State Investment Board (WSIB) provided.

The CMAs contain three pieces of information for each class of assets the WSIB currently invest in:

- Expected annual return
- Standard deviation of the annual return
- Correlations between the annual returns of each asset class with every other asset class

WSIB uses the CMAs and their target asset allocation to simulate future investment returns over various time horizons.

The expected future rates of return are developed by the WSIB for each major asset class.

Best estimates of arithmetic real rates of return for each major asset class included in the pension plans' target asset allocation as of June 30, 2022, are summarized in the following table:

TRS 1, TRS 2/3, PERS 1, and SERS 2/3				
Asset Class	Target Allocation	% Long-term Expected Real Rate of Return		
Fixed Income	20.00%	1.50%		
Tangible Assets	7.00%	4.70%		
Real Estate	18.00%	5.40%		
Global Equity	32.00%	5.90%		
Private Equity	23.00%	8.90%		

The inflation component used to create the above table is 2.20% and represents WSIB's most recent long-term estimate of broad economic inflation.

#### **Discount Rate**

The discount rate used to measure the total pension liability was 7.00%. To determine the discount rate, an asset sufficiency test was completed to test whether the pension plan's fiduciary net position was sufficient to make all projected future benefit payments of current plan members. Based on the assumptions described in the DRS Certification Letter, the pension plan's fiduciary net position was projected to be available to make all projected future benefit payments of current plan members. Therefore, the long-term expected rate of return, a 7.00% on pension plan investments was applied to determine the total pension liability.

## **Sensitivity of the Net Pension Liability (Asset)**

The following table presents the Chehalis School District's proportionate share of the collective net pension liability or asset calculated using the discount rate of 7.00%, as well as what the net

pension liability or asset would be if it were calculated using a discount rate that is one percentage-point lower (6.00%) or one percentage-point higher (8.00%) than the current rate. Amounts are calculated using the school district's specific allocation percentage, by plan, to determine the proportionate share of the collective net pension liability or asset.

Sensitivity of the	Net Pension Liability o	r Asset to Changes i	n the Discount Rate
	1% Decrease (6.00%)	Current Discount Rate (7.00%)	1% Increase (8.00%)
PERS 1	\$3,719,876,000	\$2,784,367,000	\$1,967,887,000
Allocation Percentage	0.045196%	0.045196%	0.045196%
Proportionate Share	\$1,681,243	\$1,258,428	\$889,410
SERS 2/3	\$929,172,000	(\$268,650,000)	(\$1,255,926,000)
Allocation Percentage	0.242391%	0.242391%	0.24391%
Proportionate Share	\$2,252,229	(\$651,183)	(\$3,044,251)
TRS 1	\$2,582,448,000	\$1,901,830,000	\$1,306,883,000
Allocation Percentage	0.260981%	0.260981%	0.260981%
Proportionate Share	\$6,739,710	\$4,963,424	\$3,410,722
TRS 2/3	\$3,565,129,000	(\$196,786,000)	(\$3,255,167,000)
Allocation Percentage	0.255347%	0.255347%	0.255347%
Proportionate Share	\$9,103,447	(\$502,487)	(\$8,311,969)

# NOTE 6: ANNUAL OTHER POST-EMPLOYMENT BENEFIT COST AND NET OPEB OBLIGATIONS

The state, through the Health Care Authority (HCA), administers a defined benefit other post-employment benefit (OPEB) plan that is not administered through a qualifying trust. The Public Employees Benefits Board (PEBB), created within the HCA, is authorized to design benefits, and determine the terms and conditions of employee and retired employee participation and coverage, including establishment of eligibility criteria for both active and retired employees. Benefits purchased by PEBB include medical, dental, life insurance and long-term disability insurance.

The relationship between the PEBB OPEB plan and its member employers and their employees and retirees is not formalized in a contract or plan document. Rather, the benefits are provided in accordance with a substantive plan. A substantive plan is one, which the employers and plan members understand the plan terms. This understanding is based on communications between the HCA, employers and plan members, and historical pattern of practice with regards to sharing of benefit costs.

Employers participating in the plan include the state of Washington (which includes general government agencies and higher education institutions), political subdivisions and tribal governments. Additionally, the PEBB plan is available to the retirees of the K–12 school districts and ESDs. The District's retirees (approximately 177) are eligible to participate in the PEBB plan under this arrangement.

#### **Eligibility**

District members are eligible for retiree medical benefits after becoming eligible for service retirement pension benefits (either reduced or full pension benefits) Under PERS 1, 2, 3; TRS 1, 2, or 3; or SERS 2 and 3 plans.

Former members who are entitled to a deferred vested pension benefit are not eligible to receive medical and life insurance benefits after pension benefit commencement. Survivors of covered members who die are eligible for medical benefits.

#### **Medical Benefits**

Upon retirement, members are permitted to receive medical benefits. Retirees pay the following monthly rates for pre-65 medical coverage for 2022.

Members not eligible for Medicare				
(or enrolled in Part A only)	Type of Coverage			
Descriptions	Employee	Employee & Spouse	Full Family	
Kaiser Permanente NW Classic	\$768.23	\$1,531.47	\$2,103.90	
Kaiser Permanente NW CDHP	\$643.88	\$1,277.21	\$1,708.47	
Kaiser Permanente WA Classic	\$813.24	\$1,621.48	\$2,227.66	
Kaiser Permanente WA CDHP	\$641.39	\$1,272.99	\$1,702.94	
Kaiser Permanente WA Sound Choice	\$659.19	\$1,313.37	\$1,804.01	
Kaiser Permanente WA Value	\$721.89	\$1,438.79	\$1,976.46	
UMP Classic	\$718.68	\$1,432.35	\$1,967.61	
UMP Select	\$647.73	\$1,290.45	\$1,772.50	
UMP CDHP	\$638.69	\$1,270.29	\$1,700.24	
UMP Plus-Puget Sound High Value Network	\$687.13	\$1,369.26	\$1,880.86	
UMP Plus-UW Medicine Accountable Care Network	\$687.13	\$1,369.26	\$1,880.86	

Retirees enrolled in Medicare Parts A and B receive an explicit subsidy in the form of reduced premiums on Medicare supplemental plans. Retirees pay the following monthly rates.

Members enrolled in Part A and B of Medicare	Type of Coverage		
Descriptions	<u>Employee</u>	Employee & Spouse <sup>1</sup>	<u>Full</u> Family <sup>1</sup>
Kaiser Permanente NW Senior Advantage	\$172.79	\$340.58	\$913.01
Kaiser Permanente WA Medicare Plan	\$175.69	\$346.39	N/A
Kaiser Permanente WA Classic	N/A	N/A	\$952.57
Kaiser Permanente WA Sound Choice	N/A	N/A	\$837.03
Kaiser Permanente WA Value	N/A	N/A	\$884.06
UMP Classic	\$364.87	\$724.74	\$1,260.00
Note 1: Employee–Spouse and Full Family w	·	· .	Ψ1,200.0

#### **Funding Policy**

The School Employees Benefits Board (SEBB) Program administers health insurance and other benefits to all employees in school districts and charter schools, and union-represented employees of educational service districts in Washington. The SEBB studies, designs, and approves comprehensive and cost-effective insurance benefit plans for school employees and establishes eligibility criteria for participation in these plans. The SEB Board is separate and independent from the Public Employees Benefits Board (PEBB).

The funding policy is based upon pay-as-you go financing.

The SEBB collects benefit premiums from all school district entities for covered employees. The premium includes a fee, established in state law. The purpose of this fee is to cover the impact of the subsidized rate of health care benefits for school retirees who elect to purchase their health care benefits through the state Health Care Authority PEBB plan. The amount collected is set forth in the state's operating budget and is subject to change on an annual basis. This amount is not actuarially determined and is not placed in a trust to pay the obligations for postemployment health care benefits.

For the fiscal year 2021-22, the Chehalis School District paid \$5,029,369.00 in total to HCA-SEBB.

The District has no control over the benefits offered to retirees, the rates charged to retirees, nor the fee paid to the Health Care Authority. The District does not determine its annual required contribution, nor the net other post-employment benefit obligation associated with this plan. These amounts are not shown on the financial statements.

For further information on the results of the actuarial valuation of the employer provided subsidies associated with the state's PEBB plan, refer to the Office of the State Actuary. The plan does not issue a separate report; however, additional information is included in the State of Washington Annual Comprehensive Financial Report, which is available on the OFM website.

## **NOTE 7: LEASES**

As disclosed in Note 1, for the year ended August 31, 2022, the district implemented guidance for the presentation and disclosures of leases, as required by the School District Accounting Manual. The district does not have any leases that have been determined by the district to be material to the presentation of the financial statements. However, as this is a new accounting standard, the district is not certain how materiality will be determined by outside agencies. Therefore, the district has disclosed the most significant leases within the financial statements.

#### **Lease of Capital Assets (not owned by the District)**

The following is a table that summarizes the district's copy machine leases and land lease held with the Department of Natural Resources/Department of Social and Health Services.

As of August 31, 2022, the principal and interest requirements to maturity are as follows:

Year ended August 31	Principal	Interest	Total
2023	\$51,961.61	\$6,506.09	\$58,467.70
2024	\$54,284.89	\$4,182.81	\$58,467.70
2025	\$44,288.14	\$1,801.65	\$46,089.79
2026	\$8,113.08	\$842.98	\$8,956.06
2027	\$8,384.86	\$571.20	\$8,956.06
2028	\$8,665.76	\$290.30	\$8,956.06
Total	\$175,698.34	\$14,195.03	\$189,893.37

Changes in lease liabilities are presented in the accompanying Schedule of Long-Term Liabilities.

## **Lease of Capital Assets (owned by the District)**

The District leases cell tower space to Verizon and also classroom/office space to the Lewis Conservation District.

Lease income to maturity for the fiscal year ended August 31, 2022 is detailed below:

	Lease Income	Additional
	(Principal)	Income (Interest)
Verizon (2023-2025)	\$81,808.60	\$5,270.08
Lewis Conservation (2023-2025)	\$18,151.07	\$907.30
Total Lease Income	\$99,959.67	\$6,177.38

## **NOTE 8: REQUIRED DISCLOSURES ABOUT CAPITAL ASSETS**

The District's capital assets are insured in the amount of \$154,854,025 for fiscal year 2022. In the opinion of the District's insurance consultant, the amount is sufficient to adequately fund replacement of the District's assets.

## **NOTE 9: LONG-TERM DEBT**

## **Long-Term Debt (Voted)**

The accompanying Schedule of Long-Term Liabilities provides more details of the outstanding debt and liabilities of the district and summarizes the district's debt transactions for year ended August 31, 2022.

The following is a summary of changes in voted long-term debt of the District for the fiscal year ended August 31, 2022:

Governmental activities	Balance at Sept. 1, 2021	Increases	Decreases	Balance at Aug. 31, 2022	Due within One Year
General Obligation Bonds	\$30,240,000	\$0	\$685,000	\$29,555,000	\$770,000

Long-term debt at August 31, 2022, are comprised of the following individual issues:

Issue Name	Amount Authorized	Annual Installments	Final Maturity	Interest Rate(s)	Amount Outstanding
General Obligation					
Bonds	\$23,480,000	Variable	12/01/2036	3.71%	\$21,250,000
General Obligation					
Bonds	\$8,830,000	Variable	12/01/2038	3.65%	\$8,305,000
Total	\$32,310,000				\$29,555,000

Debt service requirements on long-term debt as of August 31, 2022, are as follows:

	Вог	nds	
Years Ending August 31	Principal	Interest	Total
2023	\$770,000	\$1,382,231.26	\$2,152,231.26
2024	\$845,000	\$1,350,581.26	\$2,195,581.26
2025	\$940,000	\$1,307,893.76	\$2,247,893.76
2026	\$1,040,000	\$1,260,643.76	\$2,300,643.76
2027	\$1,145,000	\$1,208,581.26	\$2,353,581.26
2028–2032	\$7,560,000	\$5,047,593.80	\$12,607,593.80
2033–2037	\$11,375,000	\$2,778,709.39	\$14,153,709.39
2038-2039	\$5,880,000	\$269,100	\$6,149,100
Total	\$29,555,000	\$14,605,334.49	\$44,160,334.49

At August 31, 2022, the District had \$1,065,181.00 available in the Debt Service Fund to service the general obligation bonds.

## **Long-Term Debt (Non-voted) Bus Purchases**

The following is a summary of non-voted long-term debt transactions of the District for the fiscal year ended August 31, 2022:

Long-Term Debt Payable at 9/1/2021	\$305,888.92
New Issues	\$212,287.82
Debt Retired	\$84,750.11
Long-Term Debt Payable at 8/31/2022	\$433,426.63

The following is a schedule of annual requirements to amortize non-voted debt at August 31, 2022:

Years Ending August 31	Principal	Interest	Total
2023	\$127,308.09	\$19,176.98	\$146,485.07
2024	\$104,730.62	\$12,685.71	\$117,416.33
2025	\$110,018.80	\$7,316.97	\$117,335.77
2026	\$44,523.44	\$3,453.42	\$47,976.86
2027	\$46,806.69	\$1,170.17	\$47,976.86
Total	\$433,387.64	\$43,803.25	\$477,190.89

## **NOTE 10: INTERFUND BALANCES AND TRANSFERS**

The following table depicts interfund transfer activity:

Transferred From (Fund) 535 or 536	Transferred To (Fund) 965 9900 or 9901	Amount	Description
Transportation			Bus Principal & Bus Interest
Vehicle Fund	Debt Service Fund	\$102,384.76	Payments

## **NOTE 11: ENTITY RISK MANAGEMENT ACTIVITIES**

The District is exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions; injuries to employees; and natural disasters.

Chehalis School District is a member of Schools Insurance Association of Washington (SIAW). Chapter 48.62 RCW authorizes the governing body of any one or more governmental entities to form together into or join a program or organization for the joint purchasing of insurance, and/or joint self-insuring, and/or joint hiring or contracting for risk management services to the same extent that they may individually purchase insurance, self-insure, or contract for risk management services. An agreement to form a pooling arrangement was made pursuant to the provisions of Chapter 39.34 RCW, the Interlocal Cooperation Act. The program was formed on September 1, 1995, when seven mid-sized school districts in the state of Washington joined together by signing an Interlocal Agreement to pool their self-insured losses and jointly purchase insurance and administrative services. Presently, the SIAW program has 36 member districts.

The program allows members to jointly purchase insurance coverage and provide related services, such as administration, risk management, claims administration, etc. Coverage for Wrongful Acts Liability, Miscellaneous Professional Liability, and Employee Benefit Liability is on a claims-made basis. All other coverages are on an occurrence basis. The program provides the following forms of group purchased insurance coverage for its members: Property, Earthquake, General Liability, Auto Liability, Equipment Breakdown, Crime, Wrongful Acts Liability, and Cyber Liability.

The program acquires Liability insurance through their administrator, Clear Risk Solutions, which is subject to a per-occurrence self-insured retention (SIR) of \$350,000. Members are responsible for a standard deductible of \$5,000 for each claim (some member deductibles vary), while the program is responsible for the \$350,000 SIR. Insurance carriers cover insured losses over \$355,000 to the limits of each policy. Since the program is a cooperative program, there is a joint liability among the participating members towards the sharing of the \$350,000 SIR. The program also purchases a Stop Loss Policy with an attachment point of \$8,170,808 which is fully funded in its annual budget.

Property insurance is subject to a per-occurrence SIR of \$350,000. Members are responsible for a \$10,000 deductible for each claim (some member deductibles vary), while the program is responsible for the \$350,000 SIR. Insurance carriers cover insured losses over \$360,000 to the limits of each policy. Equipment Breakdown insurance is subject to a per-occurrence deductible of \$10,000. Members are responsible for the deductible amount of each claim.

Privacy, Security, and Technology (Cyber) insurance is subject to a per-occurrence SIR of \$250,000. Members are responsible for a \$25,000 deductible for each claim, while the program is responsible for the remaining \$225,000 SIR.

Members contract to remain in the program for one year and must give notice before December 31 to terminate participation the following September 1. Renewal of the Interlocal Agreement occurs automatically each year. Even after termination, a member is still responsible for contributions to the program for any unresolved, unreported, and in-process claims for the period they were a signatory to the Interlocal Agreement.

The program is fully funded by its member participants. Claims are filed by members with Clear Risk Solutions, which has been contracted to perform program administration, claims adjustment and administration, and loss prevention for the program. Fees paid to the third party administrator under this arrangement for the year ending August 31, 2022, were \$3,244,410.00.

A board of directors, consisting of eight members, is selected by the membership from the east and west side of the state and is responsible for conducting the business affairs of the program. The board of directors has contracted with Clear Risk Solutions to perform day-to-day administration of the program. This program has no employees.

## **Worker's Compensation**

Chehalis School District is a member of the ESD 113 Workers' Compensation Fund, as authorized by Chapter-51.14 RCW. CR ESD 113 joined the Workers' Compensation Fund in 1983.

The Workers' Compensation Fund provides industrial injury accident insurance coverage for its membership, including excess insurance coverage and provides related services such as administrative services, safety programs and claims administration. All coverage is on an occurrence basis. The Workers' Compensation Fund is fully funded by its member participants.

Members make an annual contribution to fund the Workers' Compensation Fund. Member contributions are calculated based on the members' hours worked. The Workers' Compensation Fund retains responsibility for the payment of claims within specified self-insured retention limits prior to the application of coverage provided by its excess insurance contracts. The

Workers' Compensation Fund per-occurrence retention limit is \$450,000 and the annual aggregate retention is \$7,826,006. Since the Workers' Compensation Fund is a cooperative program, there is a joint liability among participating members.

Workers' Compensation Fund members contract to automatically renew from year to year unless the member gives written notice of its election to terminate at least 180 days prior to August 31 of any year. Termination occurs on August 31. Even after termination, a member is still responsible for contributions to the Workers' Compensation Fund for any unresolved, unreported, and in-process claims for the period they were a signatory to the interlocal governmental agreement.

The Workers' Compensation Fund is governed by a board of directors, which is comprised of one designated representative from each participating member. A five-member executive committee is responsible for conducting the business affairs of the Workers' Compensation Fund. Financial statements and disclosures for the Workers' Compensation Fund can be obtained from the following address: <a href="https://www.esd113.org">www.esd113.org</a>.

#### **Cash with a Trustee**

### **Compensated Absences**

The Compensated Absences Fund is organized under the provisions of Chapter 39.34 Interlocal Cooperation Act for the purpose of managing leave payouts. Membership is established by execution of an agreement between CR ESD 113 and each local school district.

For fiscal year ending August 31, 2022, there are six members in the Fund including five participating school districts. The Fund allows members to accumulate dedicated funds for payment of leave related to sick leave and vacation leave buy out at retirement and certain other instances. Payroll contributions are made to the Fund at the time leave is earned to reserve assets for expenses. Coverage is on an "occurrence" basis. Expenses of leave taken during employment continue to be recorded when paid.

As of August 31, 2022 the CR ESD 113 Capital Compensated Absence Pool holds \$324,572.84 on behalf of the District.

## **NOTE 12: PRIOR PERIOD CORRECTIONS**

An immaterial \$41,312.64 prior year correction was made to the District's 2020-2021 Statement of Revenues, Expenditures, and Changes in Fund Balance. An immaterial financial statement error was identified during the state audit of the District's 2020-2021 financial statements and a journal entry and correction were made.

## **Note 13: Property taxes**

Property tax revenues are collected as the result of special levies passed by the voters in the District. Taxes are levied on January 1. The taxpayer has the obligation of paying all taxes on April 30 or one-half then and one-half on October 31. Typically, slightly more than half of the collections are made on the April 30 date. The tax collections occurring after the end of the fiscal period are unavailable for revenue accrual. Therefore, the fall portion of property taxes is not accrued as revenue. Instead, the property taxes due after the end of the fiscal period are recorded as a deferred inflow of resources.

# NOTE 14: JOINT VENTURES AND JOINTLY GOVERNED ORGANIZATIONS

The District provides educational services to residents of **Green Hill Academic School** and also to **Lewis County Juvenile Detention**. The financial operations for these services are included in the Chehalis School District's General Fund.

Chehalis School District is also involved in the **Centralia-Chehalis Pupil Transportation Cooperative** with Centralia acting as the lead district. The districts share certain administrative and support costs and Chehalis reimburses Centralia monthly or as billed for its portion of the shared costs. For fiscal year 2021-22, billed cooperative expenditures totaled **\$1,553,612.56** plus **\$115,588.77** in indirects and **\$9,211.30** in utilities; totaling **\$1,678,412.63**. Expenditures for the cooperative are split between districts based upon the STARS funding program which is driven mainly by miles driven by each district. The percentages for the fiscal year 2021-2022 school year were:

Centralia **61.99%** Chehalis **38.01%** 

Pursuant to direction of the Office of Superintendent's instructions, revenues and expenditures for the transportation cooperative are reflected in the financial statements as gross amounts, rather than net. Centralia records the full expenditures for the cooperative. Chehalis records their expenditure portion as a payment to other school district and Centralia records the receipt of that payment as revenue from another school district.

As identified above, the total billed transportation cooperative expenditures for the fiscal 2021-2022 year were **\$1,553,612.56**. Chehalis' motor pool repairs totaled **\$56,221.49**. Centralia School District carries an accounts receivable balance for outside shop work performed by cooperative mechanics for outside agency billable work; **\$112,353.07** was generated from this work in 2021-2022; Chehalis School District is paid for 38.01% of the generated revenue annually.

The District is a member of the **King County Director's Association (KCDA)**. KCDA is a purchasing cooperative designed to pool the member districts' purchasing power. The board authorized joining the association effective November 25, 1970, and has remained in the joint venture ever since. The District's current equity of \$44,291.50 is the accumulation of the annual assignment of KCDA's operating surplus based upon the percentage derived from KCDA's total sales to the District compared to all other districts applied against paid administrative fees. The District may withdraw from the joint venture and will receive its equity in ten annual allocations of merchandise or 15 annual payments.

# **NOTE 15: FUND BALANCE CLASSIFICATION DETAILS**

The District's financial statements include the following amounts presented in the aggregate.

	General Fund	ASB Fund	Capital Projects Fund	Debt Service Fund	Transportation Vehicle Fund
Nonspendable Fund Balance					
Inventory and Prepaid Items (840)	\$4,383.56				
Restricted					
<b>Fund Balance</b>					
For Other Items (810)	\$398,459.53				
For Fund Purpose (819)		\$219,029.43			\$133,967.04
For Carryover of Restricted Revenues (821)	\$1,128,641.53				
For Carryover of Food Service Revenue	\$43,891.59				
For Debt Service (830)				\$1,065,181.00	
Assigned Fund Balance					
Contingencies (875)	\$750,000.00				
*Other Purposes (888)	\$3,266,232.54			_	
Fund Purposes (889)			\$1,688,288.21	\$4,200.00	

	General Fund	ASB Fund	Capital Projects Fund	Debt Service Fund	Transportation Vehicle Fund
Unassigned Fund Balance (890)	\$1,014,379.08				
Totals	\$6,605,987.83	\$219,029.43	\$1,688,288.21	\$1,069,381.00	\$133,967.04

\*On February 16, 2021, Chehalis School Board revised Board Policy 6022, Minimum Fund Balance. The language of the policy includes, "The District recognizes the importance of maintaining a prudent fund balance in the general fund to ensure operational cash flow needs are met, to set aside resources for known obligations and help protect against unforeseen circumstances. Accordingly, the district adopts this policy in regards to those portions of fund balance that are in spendable form, but are not legally restricted as to their use from outside sources.

Annually, the superintendent or designee will present a general fund budget that includes an assignment of at least five percent (5%) of the current year's expenditures towards a minimum fund balance.

This will be classified within our annual financial statements as Assigned to Other Purposes."

\*Of the \$3,266,232.54 reported as Assigned to Other Purposes, \$2,744,436.00 is related to Board Policy 6022, Minimum Fund Balance. \$2,744,436.00 is also the portion reported on the District's Balance Sheet within the total \$4,016,232.54 Assigned Fund Balance.

## **NOTE 16: DEFINED CONTRIBUTION PENSION AND OPEB PLANS**

## 457 Plan – Deferred Compensation Plan

District employees have the option of participating in a deferred compensation plan as defined in §457 of the Internal Revenue Code that is administered by the state deferred compensation plan, or the District. The District does not make employer contributions to the plan.

## 403(b) Plan – Tax Sheltered Annuity (TSA)

The District offers a tax deferred annuity plan for its employees. The plan permits participants to defer a portion of their salary until future years under two types of deferrals: elective deferrals (employee contribution) and non-elective contribution (employer matching) at contribution rate in dollars. The Chehalis School District does not offer an employer matching contribution and shares no liability in the plan. District employees contributed a total of \$267,471.43 during fiscal year 2021-2022.

The District complies with IRS regulations that require school districts to have a written plan to include participating investment companies, types of investments, loans, transfers, and various requirements. The plan is administered by a third party administrator. Plan assets are assets of the District employees, not the school district, and are therefore not reflected on the financial statements.

#### **Voluntary Employees' Benefits Association (VEBA)**

VEBA Trust is a non-profit, multiple employee voluntary employees' beneficiary association authorized under Internal Revenue Code 501(c)(g). The Trust is managed by a board of trustees appointed by the Association of Washington School Principals, Washington Association of School Administrators, and Washington Association of School Business Officials. The Trust provides health reimbursement plan for employees and eligible dependents. The plan can be used to reimburse employees for qualified health expenses during employment and after retirement. The terms of the collective bargaining arrangements specify the district's employer contribution rate of various rates per collective bargaining agreement and applicable group. Plan assets are assets of the District employees, not the school district, and are therefore not reflected on the financial statements. For the year ended August 31, 2022 the District made \$378,415.00 in employer contributions to the plan and employees made \$52,300.00 in employee contributions to the plan.

#### **Health Reimbursement Arrangement (HRA)**

The District offers HRAs for its employees. An HRA is a tax-free health savings account for medical expenses and premiums during employment and/or at retirement. Chehalis School District's plan only allows the funds to be used upon retirement. For the year ended August 31, 2022, the District made \$39,600.00 in employer contributions to the plan. No employee contributions were made to the plan.

## **NOTE 17: TERMINATION BENEFITS**

### **Compensated Absences**

Employees earn sick leave at a rate of 12 days per year up to a maximum of one contract year.

Under the provisions of RCW 28A.400.210, sick leave accumulated by District employees is reimbursed at death or retirement at the rate of one day for each four days of accrued leave, limited to 180 accrued days. This chapter also provides for an annual buyout of an amount up to the maximum annual accumulation of 12 days. For buyout purposes, employees may accumulate such leave to a maximum of 192 days, including the annual accumulation, as of December 31 of each year.

These expenditures are recorded when paid, except termination sick leave that is accrued upon death, retirement, or upon termination provided the employee is at least 55 years of age and has sufficient years of service. Vested sick leave was computed using the termination payment method.

Vacation pay, including benefits, that is expected to be liquidated with expendable available financial resources is reported as expenditures and a fund liability of the governmental fund that will pay it.

No unrecorded liability exists for other employee benefits.

Chehalis School District No. 302

Schedule of Long-Term Liabilities

For the Year Ended August 31, 2022

Description	Beginning Outstanding Debt September 1, 2021	Amount Issued / Increased	Amount Redeemed / Decreased	Ending Outstanding Debt August 31, 2022	Amount Due Within One Year
Voted Debt					
Voted Bonds	30,240,000.00	00.00	685,000.00	29,555,000.00	770,000.00
LOCAL Program Proceeds Issued in Lieu of Bonds	0.00	00.00	0.00	00.00	00.0
Non-Voted Debt and Liabilities					
Non-Voted Bonds	0.00	00.00	0.00	00.00	00.0
LOCAL Program Proceeds	305,888.92	212,287.82	84,750.11	433,426.63	127,308.09
Leases	225,366.97	00.00	49,783.51	175,583.46	51,961.61
Contracts Payable	0.00	00.00	0.00	00.00	00.0
Claims & Judgements	0.00	00.00	00.0	00.00	00.0
Compensated Absences	1,701,679.15	328,329.88	380,215.89	1,649,793.14	326,000.00
Long-Term Notes	0.00	00.00	0.00	00.00	00.0
Anticipation Notes Payable	0.00	00.00	0.00	00.00	00.0
Lines of Credit	0.00	00.00	0.00	00.00	00.0
Other Non-Voted Debt	0.00	00.00	0.00	00.00	00.0
Other Liabilities					
Non-Voted Notes Not Recorded as Debt	0.00	00.00	00.0	00.00	00.0
Net Pension Liabilities:					
Net Pension Liabilities TRS 1	1,797,759.00	3,165,664.00	0.00	4,963,423.00	
Net Pension Liabilities TRS $2/3$	0.00	00.00	0.00	00.00	
Net Pension Liabilities SERS 2/3	0.00	00.00	0.00	00.00	
Net Pension Liabilities PERS 1	499,130.00	759,298.00	00.0	1,258,428.00	
Total Long-Term Liabilities	34,769,824.04	4,465,579.70	1,199,749.51	38,035,654.23	1,275,269.70

Other postemployment benefits other than pensions (OPEB) liabilities are not presented in the Schedule of Long Term Liabilities.

Chehalis School District No. 302 Schedule of Expenditures of Federal Awards For the Year Ended August 31, 2022

Expenditures

				•					
	Federal Agency (Pass-Through Agency)	Federal Program	ALN Number	Other Award Number	From Pass- Through Awards	From Direct Awards	Total	Passed through to Subrecipients	Note
	Child Nutrition Cluster								
	FOOD AND NUTRITION SERVICE, AGRICULTURE, DEPARTMENT OF (via OSPI)	National School Lunch Program	10.555	n/a	77,390	ı	77,390	•	1,3,4
	FOOD AND NUTRITION SERVICE, AGRICULTURE, DEPARTMENT OF (via OSPI)	National School Lunch Program	10.555	n/a	1,336,200	ı	1,336,200	•	£,
				Total ALN 10.555:	1,413,590		1,413,590	1	
	FOOD AND NUTRITION SERVICE, AGRICULTURE, DEPARTMENT OF (via OSPI)	Summer Food Service Program for Children	10.559	n/a	59,910	ı	59,910	•	<del>د</del> ,
			Total Chil	ial Child Nutrition Cluster:	1,473,500	•	1,473,500	•	
	FOOD AND NUTRITION SERVICE, AGRICULTURE, DEPARTMENT OF (via OSPI)	COVID 19 - Pandemic EBT Administrative Costs	10.649	ה/מ	3,063		3,063	•	£, 1, 3
	Forest Service Schools and Roads Cluster	is Cluster							
	FOREST SERVICE, AGRICULTURE, DEPARTMENT OF (via WA State Treasurer)	Schools and Roads - Grants to States	10.665	n/a	188,228		188,228	•	<del>د</del> ن
		Total Forest Serv	ice Schools	Total Forest Service Schools and Roads Cluster:	188,228	•	188,228	•	
	FEDERAL COMMUNICATIONS COMMISSION, FEDERAL COMMUNICATIONS COMMISSION	COVID 19 - Emergency Connectivity Fund Program	32.009		1	563,021	563,021		<del>ε</del> ,
Page 69	OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, (via OSPI)	Title I Grants to Local Educational Agencies	84.010	0204104	455,197	•	455,197	1	1,2,3, 5

The accompanying notes are an integral part of this schedule.

Chehalis School District No. 302 Schedule of Expenditures of Federal Awards For the Year Ended August 31, 2022

					Expenditures			
Federal Agency (Pass-Through Agency)	Federal Program	ALN Number	Other Award Number	From Pass- Through Awards	From Direct Awards	Total	Passed through to Subrecipients	Note
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, DEPARTMENT OF (via OSPI)	Title I Grants to Local Educational Agencies	84.010	0224771	26,307	'	26,307	1	1,2,3
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, DEPARTMENT OF (via OSPI)	Title I Grants to Local Educational Agencies	84.010	0225912	637,500	1	637,500	•	1,2,3
			Total ALN 84.010:	1,119,004	•	1,119,004		
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, DEPARTMENT OF (via OSPI)	Migrant Education State Grant Program	84.011	0282537	11,330	1	11,330	•	1,2,3, 5
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, DEPARTMENT OF (via OSPI)	Title I State Agency Program for Neglected and Delinquent Children and Youth	84.013	0223144	518,972	ı	518,972		1,2,3
Special Education Cluster (IDEA)								
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES, EDUCATION, DEPARTMENT OF (via OSPI)	COVID 19 - Special Education Grants to States	84.027	0312019	149,778	1	149,778	•	1,2,3
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES, EDUCATION, DEPARTMENT OF (via OSPI)	Special Education Grants to States	84.027	0307364	612,368	•	612,368	•	1,2,3
Page			Total ALN 84.027:	762,146	•	762,146	•	

The accompanying notes are an integral part of this schedule.

Chehalis School District No. 302 Schedule of Expenditures of Federal Awards For the Year Ended August 31, 2022

					Expenditures			
Federal Agency (Pass-Through Agency)	Federal Program	ALN Number	Other Award Number	From Pass- Through Awards	From Direct Awards	Total	Passed through to Subrecipients	Note
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES, EDUCATION, DEPARTMENT OF (via OSPI)	COVID 19 - Special Education Preschool Grants	84.173	84.173X, 0371020	3,093	·   '	3,093	'	1,2,3
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES, EDUCATION, DEPARTMENT OF (via OSPI)	Special Education Preschool Grants	84.173	0366746	15,017	•	15,017	•	1,2,3
			Total ALN 84.173:	18,110		18,110	1	
	Total Special		Education Cluster (IDEA):	780,256	•	780,256		
Office of Career, Technical, and Adult Education, EDUCATION, DEPARTMENT OF (via OSPI)	Career and Technical Education Basic Grants to States	84.048	0174904	19,238	1	19,238	•	1,2,3
Office of Career, Technical, and Adult Education, EDUCATION, DEPARTMENT OF (via OSPI)	Career and Technical Education Basic Grants to States	84.048	0189618	80,508	•	80,508	•	1,2,3
			Total ALN 84.048:	79,746	•	79,746		
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION (via OSPI)	English Language Acquisition State Grants	84.365	0403182	16,524	•	16,524	•	1,2,3
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, OFPARTMENT OF (via OSPI)	Supporting Effective Instruction State Grants (formerly Improving Teacher Quality State Grants)	84.367	0525418	95,591	•	95,591	•	1,2,3

The accompanying notes are an integral part of this schedule.

Chehalis School District No. 302 Schedule of Expenditures of Federal Awards For the Year Ended August 31, 2022

			1		Expenditures			
Federal Agency (Pass-Through Agency)	Federal Program	ALN Number	Other Award Number	From Pass- Through Awards	From Direct Awards	Total	Passed through to Subrecipients	Note
EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via OSPI)	Student Support and Academic Enrichment Program	84.424	0431168	30,871	'	30,871	'	1,2,3
Research & Development Cluster								
EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via OSPI)	COVID 19 - Education Stabilization Fund	84.425	84.425U, 0712008	9,512	1	9,512	•	1,2,3
	Total Research	search & De	& Development Cluster:	9,512	•	9,512		
EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via OSPI)	COVID 19 - Education Stabilization Fund	84.425	84.425D, 0120437	1,049,481	1	1,049,481	•	1,2,3
EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via OSPI)	COVID 19 - Education Stabilization Fund	84.425	84.425D, N/A	73,497	1	73,497	•	1,2,3
EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via OSPI)	COVID 19 - Education Stabilization Fund	84.425	84.425U, 0137150	399,042	•	399,042	•	1,2,3
EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via OSPI)	COVID 19 - Education Stabilization Fund	84.425	84.425U, 0138065	1,217,632	1	1,217,632	•	1,2,3
EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via OSPI)	COVID 19 - Education Stabilization Fund	84.425	84.425U, 0142501	39,000	1	39,000	•	1,2,3
EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via OSPI)	COVID 19 - Education Stabilization Fund	84.425	84.425U, 0712141	7,490	1	7,490	•	1,2,3
			Total ALN 84.425:	2,786,142	• 	2,786,142	1	
Medicaid Cluster								

Medicaid Cluster

The accompanying notes are an integral part of this schedule.

Chehalis School District No. 302 Schedule of Expenditures of Federal Awards For the Year Ended August 31, 2022

					Expenditures			
Federal Agency (Pass-Through Agency)	Federal Program	ALN Number	Other Award Number	From Pass- Through Awards	From Direct Awards	Total	Passed through to Subrecipients	Note
CENTERS FOR MEDICARE AND MEDICAID SERVICES, HEALTH AND HUMAN SERVICES, DEPARTMENT OF (via WA HCA)	Medical Assistance Program	93.778	n/a	26,926	1	26,926	'	1,3
CENTERS FOR MEDICARE AND MEDICAID SERVICES, HEALTH AND HUMAN SERVICES, DEPARTMENT OF (via WA HCA)	Medical Assistance Program	93.778	Α/Α	3,848	•	3,848	•	6,
		Tota	Total Medicaid Cluster:	30,774		30,774	1	
		otal Federal	Total Federal Awards Expended:	7,143,513	563,021	7,706,534	•	

#### Notes to the SEFA

#### Chehalis School District No. 302

#### For fiscal year ended August 31, 2022

#### NOTE 1—BASIS OF ACCOUNTING

This Schedule is prepared on the same basis of accounting as the Chehalis School District's financial statements. The Chehalis School District uses the modified accrual basis of accounting. Expenditures represent only the federally funded portions of the program. District records should be consulted to determine amounts expended or matched from non-federal sources.

#### NOTE 2—FEDERAL DE MINIMIS INDIRECT RATE

The Chehalis School District has not elected to use the 10-percent de minimis indirect cost rate allowed under the Uniform Guidance. The Chehalis School District used the federal restricted rate of 0.0296% and unrestricted rate of 0.123%.

#### **NOTE 3—PROGRAM COSTS/MATCHING CONTRIBUTIONS**

The amounts shown as current year expenses represent only the federal award portion of the program costs. Entire program costs, including the Chehalis School District's local matching share, may be more than shown. Such expenditures are recognized following, the cost principles contained in Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

#### NOTE 4—NONCASH AWARDS

The amount of commodities reported on the schedule is the value of commodities distributed by the Chehalis School District during the current year and priced as prescribed by USDA.

#### NOTE 5—SCHOOLWIDE PROGRAMS

The Chehalis School District operates a "schoolwide program" in two elementary buildings. Using federal funding, schoolwide programs are designed to upgrade an entire educational program within a school for all students, rather than limit services to certain targeted students. The following federal program amounts were expended by the Chehalis School District in its schoolwide program: Title I (84.010) \$455,197.14; Migrant Education (84.011) \$11,330.04.



# CORRECTIVE ACTION PLAN FOR FINDINGS REPORTED UNDER UNIFORM GUIDANCE

## Chehalis School District No. 302 September 1, 2021 through August 31, 2022

This schedule presents the corrective action planned by the District for findings reported in this report in accordance with Title 2 *U.S. Code of Federal Regulations* (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance).

Finding ref number:	Finding caption:
2022-001	The District did not have adequate internal controls for ensuring
	compliance with wage rate requirements.

## Name, address, and telephone of District contact person:

Heather C. Pinkerton 310 S.W. 16th Street Chehalis, WA 98532 360-807-7207

## Corrective action the auditee plans to take in response to the finding:

It is highly unusual for the district to utilize federal funds for construction projects; the Covid-19 Education Stabilization Funds were an anomaly. The District's Director of Business and Operations was unaware that prevailing wage clauses are required to be included in all public works contracts over \$2,000 that are paid with federal funds. She was aware that prevailing wages need to be paid. The audit finding does not dispute that prevailing wages were paid appropriately, just that the clauses were not included in the contracts. To be very clear, this finding is for not having required language in contracts. The District is now aware that inclusion of the clauses is a compliance requirement.

Going forward, it is unlikely that federal funds will be used for construction projects; however, when federal funds are utilized for construction projects, the District will either include the required prevailing wage rate clauses in its contracts or will obtain a separate signed clause with the required prevailing wage rate information.

**Anticipated date to complete the corrective action:** Immediately

Finding ref number:	Finding caption:
2022-002	The District did not have adequate internal controls for ensuring
	compliance with allowable activities and costs and restricted purpose
	requirements.

## Name, address, and telephone of District contact person:

Heather C. Pinkerton 310 S.W. 16th Street Chehalis, WA 98532 360-807-7207

### Corrective action the auditee plans to take in response to the finding:

The Chehalis School District does not concur with the finding or the questioned costs. The State Auditor's Office (SAO) reviewed various types of documentation and did not accept documentation presented by the District to reduce or eliminate questioned costs. The standard of documentation required by SAO to satisfy "unmet need" would have been hard to meet even if the District hadn't been in the midst of a pandemic.

The District has internal controls over asset inventory and provided equipment only to students and staff with unmet needs, and all costs were allowable, reasonable and necessary.

We continue to communicate with other agencies with the ultimate goal of helping the Federal Communications Commission (FCC) understand that they should not seek any recovery of funds resulting from "documentation" issues considering the massive public health response, deployment logistics, vague federal guidance, and the effective return to in-person learning.

Along with countless other districts across the State of Washington, we look forward to working with the FCC to resolve this finding.

We appreciate the guidance that was provided by the FCC, as noted below.

#### Guidance from the FCC

Devices for remote learning could also be used at school. During the pandemic in Washington State we experienced times when classrooms, schools and or districts were closed by health department and state regulations because of outbreaks. Districts had to be prepared to support remote learning each day with constantly changing guidance on who was allowed to be in person.

The following guidance from the Federal Communications Commission, titled "Emergency Connectivity Fund Common Misconceptions", "Misconception #2: If schools have returned to in-class instruction for the upcoming school year, they are not eligible to participate. Answer: This is false. Equipment and services provided to students or school staff who would otherwise lack sufficient access to connected devices, and/or broadband internet access connection while off campus are eligible for Emergency Connectivity Fund Support."

From the Federal Communications Commission Order FCC-CIRC21-93-043021, question 77: "We think schools are in the best position to determine whether their students and staff have devices and broadband services sufficient to meet their remote learning needs, and we recognize that they are making such decisions in the midst of a pandemic. We, therefore, will not impose any specific metrics or process requirements on those determinations." And from question 53: "...we are sensitive to the need to provide some flexibility during this uncertain time. If those connected devices were purchased for the purpose of providing students...with devices for off-campus use consistent with the rules we adopt today, we will not prohibit such on-campus use."

**Anticipated date to complete the corrective action:** We will work with the FCC to resolve this issue according to their timeline.

## ABOUT THE STATE AUDITOR'S OFFICE

The State Auditor's Office is established in the Washington State Constitution and is part of the executive branch of state government. The State Auditor is elected by the people of Washington and serves four-year terms.

We work with state agencies, local governments and the public to achieve our vision of increasing trust in government by helping governments work better and deliver higher value.

In fulfilling our mission to provide citizens with independent and transparent examinations of how state and local governments use public funds, we hold ourselves to those same standards by continually improving our audit quality and operational efficiency, and by developing highly engaged and committed employees.

As an agency, the State Auditor's Office has the independence necessary to objectively perform audits, attestation engagements and investigations. Our work is designed to comply with professional standards as well as to satisfy the requirements of federal, state and local laws. The Office also has an extensive quality control program and undergoes regular external peer review to ensure our work meets the highest possible standards of accuracy, objectivity and clarity.

Our audits look at financial information and compliance with federal, state and local laws for all local governments, including schools, and all state agencies, including institutions of higher education. In addition, we conduct performance audits and cybersecurity audits of state agencies and local governments, as well as state whistleblower, fraud and citizen hotline investigations.

The results of our work are available to everyone through the more than 2,000 reports we publish each year on our website, <a href="www.sao.wa.gov">www.sao.wa.gov</a>. Additionally, we share regular news and other information via an email subscription service and social media channels.

We take our role as partners in accountability seriously. The Office provides training and technical assistance to governments both directly and through partnerships with other governmental support organizations.

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