



Office of the Washington State Auditor  
Pat McCarthy

## **Financial Statements and Federal Single Audit Report**

# **Sultan School District No. 311**

**For the period September 1, 2022 through August 31, 2023**

*Published May 31, 2024*

Report No. 1035021



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**Office of the Washington State Auditor  
Pat McCarthy**

May 31, 2024

Board of Directors  
Sultan School District No. 311  
Sultan, Washington

**Report on Financial Statements and Federal Single Audit**

Please find attached our report on Sultan School District No. 311'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 activities and condition.

Sincerely,

Pat McCarthy, State Auditor  
Olympia, WA

***Americans with Disabilities***

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# SCHEDULE OF FINDINGS AND QUESTIONED COSTS

## Sultan School District No. 311 September 1, 2022 through August 31, 2023

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

The results of our audit of Sultan School District No. 311 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 identified 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 – COVID 19 – 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>	<u>Program or Cluster Title</u>
32.009	COVID-19 – Emergency Connectivity Fund Program
84.027	Special Education Cluster (IDEA) – Special Education Grants to States
84.027	COVID-19 – Special Education Cluster (IDEA) – Special Education Grants to States
84.173	Special Education Cluster (IDEA) – Special Education Preschool Grants
84.173	COVID-19 – Special Education Cluster (IDEA) – Special Education Grants to States
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 did not qualify as a low-risk auditee under the Uniform Guidance.

## SECTION II – FINANCIAL STATEMENT FINDINGS

See Finding 2023-001.

## SECTION III – FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

See Finding 2023-002.

## SCHEDULE OF AUDIT FINDINGS AND RESPONSES

### Sultan School District No. 311 September 1, 2022 through August 31, 2023

#### **2023-001 The District's internal controls were inadequate for ensuring accurate reporting of its Schedule of Expenditures of Federal Awards.**

##### ***Background***

State and federal agencies, the Board of Directors, and the public rely on information included in the financial statements and reports to make decisions. Management is responsible for designing and following internal controls that provide reasonable assurance its financial reporting is reliable and the financial statements and notes to financial statements are accurate.

The District prepares its financial statements in accordance with the modified accrual basis of accounting method prescribed in the Accounting Manual for Public School Districts in the State of Washington. Required financial information includes the F-196 Annual Financial Statement and associated schedules, such as the Schedule of Expenditures of Federal Awards (SEFA).

Our audit found deficiencies in internal controls over accounting and financial reporting that affected the District's ability to produce reliable financial statements, specifically the SEFA. Government Auditing Standards requires the State Auditor's Office to communicate significant deficiencies as a finding.

##### ***Description of Condition***

The District has received federal Educational Stabilization Funds from the U.S. Department of Education since fiscal year 2021, and therefore expended these funds over the course of the last three fiscal years. For the 2022–2023 school year, the District reported the cumulative amount it expended since it received the awards on the SEFA, which included amounts it expended in prior years. As a result, the District significantly overstated the amount of the Education Stabilization Fund reported on its SEFA.

We consider this deficiency in internal controls over accounting and financial reporting to be a significant deficiency.

### ***Cause of Condition***

Staff responsible for preparing the SEFA did not correctly understand reporting requirements for multiyear grant awards. Additionally, the District's secondary review of the SEFA was not detailed enough to identify errors prior to submitting it for audit.

### ***Effect of Condition***

The District overstated its Educational Stabilization Fund program by \$2,134,227 because it reported the cumulative total of expenditures for the program rather than expenditures solely related to fiscal year 2023. The District subsequently corrected the error. However, inaccurate reporting of the federal expenditures affected our selection of major programs for audit. This required us to conduct additional audit work to ensure compliance with federal requirements. Further, an incorrect SEFA can lead to audit delays past the federal reporting deadline, cause additional audit costs and potentially jeopardize future federal funding.

### ***Recommendation***

We recommend the District strengthen its internal controls over preparing and reviewing the SEFA to ensure accurate reporting.

### ***District's Response***

*The ESSER awards are unique in that they encompass multiple years of expenditure. In preparation of the SEFA, the district was unaware that expenditures related to these awards were to be limited to activity only during the year under review (i.e. 09/01/2022 – 08/31/2023). Because of this lack of understanding, the district did inadvertently put aggregate expenditures on the SEFA report. However, the district would like to state that representation on the SEFA was the only issue that the Washington State Auditor's Office found related to its ESSER awards and that no expenditures were questioned.*

*Moving forward, the district now has additional staff in the Fiscal Department who can provide a more in-depth review of the SEFA and its preparation prior to presentation to the Superintendent for final approval. The District feels this additional review alleviate such issues moving forward.*

### ***Auditor's Remarks***

We thank the District for its cooperation throughout the audit and the steps it is taking to address these concerns. We will review the status of the District's corrective action during our next audit.

### ***Applicable Laws and Regulations***

Government Auditing Standards, July 2018 Revision, paragraphs 6.40 and 6.41 establish reporting requirements related to significant deficiencies or material weaknesses in internal control, instances of fraud, and noncompliance with provisions of laws, regulations, contracts, or grant agreements.

The American Institute of Certified Public Accountants defines significant deficiencies and material weaknesses in its Codification of Statements on Auditing Standards, section 265, Communicating Internal Control Related Matters Identified in an Audit, paragraph 7.

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 510, Financial statements, requires the auditee to prepare a schedule of expenditures of Federal awards including the total Federal awards expended during the period.

Administrative, Budgeting and Financial Reporting Handbook, Chapter 11 – Schedule of Expenditures of Federal Awards (SEFA)



## SCHEDULE OF FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

### Sultan School District No. 311 September 1, 2022 through August 31, 2023

#### **2023-002    The District did not have adequate internal controls for ensuring compliance with allowable activities and costs, equipment and restricted purpose requirements.**

<b>Assistance Listing Number and Title:</b>	32.009, COVID 19 – Emergency Connectivity Fund Program
<b>Federal Grantor Name:</b>	Federal Communications Commission
<b>Federal Award/Contract Number:</b>	ECF2190018221, ECF21990018404
<b>Pass-through Entity Name:</b>	N/A
<b>Pass-through Award/Contract Number:</b>	N/A
<b>Known Questioned Cost Amount:</b>	\$244,269
<b>Prior Year Audit Finding:</b>	N/A

#### ***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 2023, the District spent \$375,768 in ECF Program funds to purchase laptops, tablet computers and Wi-Fi switches and antennas to install internet on its school buses for students and school staff.

Federal regulations require recipients to establish and maintain internal controls that ensure compliance with program requirements. These controls include understanding program 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 (in other words, warehousing).

## Equipment

The Federal Communications Commission (FCC) requires ECF Program recipients to maintain inventories of the devices and services they have purchased with program funds. The FCC also requires inventory records to include specific elements, such as the type of equipment or service provided, equipment make/model and serial number, name of the students or employees provided the equipment or service, dates they used the equipment or service, and more.

## Restricted purpose – unmet need

When submitting applications to the 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.

## *Description of Condition*

### *Allowable activities and costs/restricted purpose – unmet need*

The District estimated unmet need for eligible equipment when it applied for ECF Program funds. However, our audit found the District's internal controls were ineffective for ensuring it documented the determination of actual unmet need and only requested reimbursement for equipment provided to students and school staff. Specifically, the District purchased laptops and tablet computers based on its estimate of unmet need, and it requested reimbursement for these purchases totaling \$244,269. However, the District did not maintain documentation showing it provided each laptop and tablet computer paid with program funds to a student or employee with unmet need.

### *Equipment*

The District maintains asset inventories; however, our audit found the District's internal controls were ineffective for ensuring it included in the inventories all required elements necessary to demonstrate compliance with federal requirements. Specifically, the District did not include:

- Names of the students or employees provided or responsible for 85 laptops
- The date that it placed 93 tablets in service
- The name of the employee provided or responsible for the 27 bus Wi-Fi routers
- All required information for the 27 bus Wi-Fi switches and antennas
- The date that it took one tablet, that was delivered broken, out of service

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

### *Cause of Condition*

#### *Allowable activities and costs/restricted purpose – unmet need*

The District conducted a survey in the Spring of 2020 and identified 442 students in need of laptops. However, when distributing the laptops, District staff did not use the survey results and instead assigned laptops to students in fifth and ninth grades to maintain operational efficiency and to limit how often District staff would need to reassign laptops. Additionally, the District purchased tablet computers for its elementary schools after consulting with school staff and estimating how many tablets they should assign at each school.

District staff did not know about the requirement to request reimbursement and assign equipment only to the specific students and staff with unmet need.

### *Equipment*

The District has a process to record most of the elements the program requires as it purchases and receives equipment. The District also allows schools to maintain their own inventory systems and independently track laptops and tablets. However, District and school staff were unaware of all specific information the program required districts to track for equipment they purchased with federal funds.

## *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 to students and school staff 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 the District charged to the award addressed unmet needs. However, the lack of a documented assessment of students' and staff's actual unmet need means that most 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 and therefore questioning the District's purchase of 450 laptops and 150 tablet computers.

Federal regulations require the Office of the Washington State Auditor 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.

### *Equipment*

Without maintaining proper asset inventory records, as the FCC requires, the District cannot demonstrate compliance with this requirement. Because of the missing information, the District cannot effectively track the use of federally funded equipment and services.

## *Recommendation*

We recommend the District work with the awarding 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 and staff with unmet need, and maintain documentation demonstrating compliance
- Maintain inventories that include all required elements to track the use of equipment and services paid with ECF Program funds

## ***District's Response***

*Sultan School District does not concur with the audit findings regarding unmet need. The district used devices to support students in a manner we feel is consistent with the guidelines established by the FCC.*

*Initially, the district had no devices to send home with students, relying instead on a Remote Desktop Technology model that only functioned within the district's wireless network. To facilitate off-campus learning and ensure a safe online experience, the district determined that the unmet need was 100%. A plan to purchase 400-450 student computers annually over three years was accelerated to a single purchase of 1,300 laptops utilizing a lease with an annual payment over 3 years. Despite this purchase, unmet need remained around 40%, leading to a request for 450 laptops and 200 iPads with ECF funds. The district notes that after fulfilling this need, two additional rounds of ECF funding were not accessed as the unmet need had been addressed.*

*On the issue of equipment inventory compliance, though all devices are accounted for, the district acknowledges missing a caretaker name for 85 laptops, they were assigned to a location, for example to the library rather than the librarian. The district also notes that for 93 tablets, the school year, rather than the exact date, was documented along with the delivery date.*

*We disagreed on the audit finding regarding bus Wi-Fi routers, noting that the items were purchased and installed as a package and that the switches and antennas did not have a separate serial number to document, the district documented all items as a single 'package'.*

*In response to the cause of condition and equipment distribution findings, the district clarified that after the preliminary survey, we addressed much of the unmet need with district funds before requesting ECF funds. Assigning computers to 5th and 9th graders was aimed at operational efficiency and sustainability in coordination with the absolute unmet need. Laptops issued in the 21-22 school year addressed unmet needs and were reissued appropriately in the 22-23 school year to continue to address unmet need in lower grade levels. The district had to purchase higher-end laptops due to supply chain issues, these laptops were more suitable for the specific grade levels (5th and 9th).*

*The district agreed that staff were unaware of the requirement to assign equipment to specific students and staff identified with unmet need, noting that laptops were assigned to buildings, classrooms, or libraries, and not directly to caretakers in those spaces. Tablets were tracked in various systems with some missing exact*

*checkout dates, but the district did record delivery dates and the school year they were checked out.*

*The district does not concur with the audit's conclusion that they could not demonstrate compliance with the program's requirements, the district maintains that their unmet need was evident for **all students** and that all district dedicated funds were exhausted **before accessing ECF funds**.*

*Finally, the district acknowledged that proper asset inventory records were not maintained as per FCC requirements and updated their inventory records to include all required information. However, the district **did follow state guidelines**, which fell short of FCC requirements. To comply with FCC inventory requirements, we have since assigned loaner laptops to a caretaker. Additionally, for the Bus WiFi, we have updated our inventory records to reflect the 'package' components to include the switch and antenna. In addition to the remedies we've already applied, for future ECF grants, the district agrees to establish and follow internal controls to ensure compliance with the awards – specifically ensuring we update our inventory systems when state and federal standards may differ.*

*We appreciate the auditor's work and diligence.*

### ***Auditor's Remarks***

We value our partnership with the District in striving for transparency in public service. 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. SAO continues to advocate for clear, timely guidance from federal agencies.

### ***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.



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Board of Directors:  
 Gigi Gaudner  
 Isaac Hudt  
 Mike Vamell  
 Marianne Naslund  
 Dave Shephard

Don Chaplik, Superintendent

## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

### Sultan School District No. 311 September 1, 2022 through August 31, 2023

This schedule presents the status of findings reported in prior audit periods.

<b>Audit Period:</b> 2022	<b>Report Reference No.:</b> 1032658	<b>Finding Ref. No.:</b> 2022-001	<b>ALN(s):</b> 84.425
<b>Federal Program Name and Granting Agency:</b> COVID-19 – Education Stabilization Fund, U.S. Department of Education		<b>Pass-Through Agency Name:</b> Office of Superintendent of Public Instruction	
<b>Finding Caption:</b> The District did not have adequate internal controls for ensuring compliance with wage rate requirements.			
<b>Background:</b> During the 2021-2022 school year, the District spent \$200,335 from its ESSER II award to pay two contractors and their subcontractors for installing and upgrading the heating, ventilation and air conditioning systems at one school building, and for upgrading the intercom communication system at another school building. Our audit found the District did not have adequate internal controls for ensuring compliance with federal prevailing wage rate requirements. Specifically, the District did not: <ul style="list-style-type: none"> <li>• Include the required prevailing wage rate clauses in the contract with both contractors</li> <li>• Collect weekly certified payroll reports from the contractors and subcontractors to confirm they paid proper prevailing wages</li> </ul> We consider these deficiencies in internal controls to be a material weakness, which led to material noncompliance.			
<b>Status of Corrective Action: (check one)</b> <input checked="" type="checkbox"/> Fully Corrected <input type="checkbox"/> Partially Corrected <input type="checkbox"/> Not Corrected <input type="checkbox"/> Finding is considered no longer valid			
<b>Corrective Action Taken:</b> <i>District now includes full legally vetted Davis-Bacon language as part of all issued purchase orders. If the district anticipates using federal funds for capital items in the future it will take all appropriate steps to ensure full compliance with applicable guidance.</i>			



## 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*

#### **Sultan School District No. 311 September 1, 2022 through August 31, 2023**

Board of Directors  
Sultan School District No. 311  
Sultan, 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 Sultan School District No. 311, as of and for the year ended August 31, 2023, and the related notes to the financial statements, which collectively comprise the District's financial statements, and have issued our report thereon dated May 30, 2024.

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. However, we identified certain deficiencies in internal control, described in the accompanying Schedule of Audit Findings and Responses as Finding 2023-001, that we consider to be significant deficiencies.

## **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*.

## **DISTRICT'S RESPONSE TO FINDINGS**

*Government Auditing Standards* requires the auditor to perform limited procedures on the District's response to the findings identified in our audit and described in the accompanying Schedule of Audit Findings and Responses. The District's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on the response.

## 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.

A handwritten signature in black ink that reads "Pat McCarthy". The signature is fluid and cursive, with the first name "Pat" and last name "McCarthy" clearly distinguishable.

Pat McCarthy, State Auditor

Olympia, WA

May 30, 2024

## 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

### **Sultan School District No. 311 September 1, 2022 through August 31, 2023**

Board of Directors  
Sultan School District No. 311  
Sultan, Washington

## **REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM**

### **Adverse and Unmodified Opinions**

We have audited the compliance of Sultan School District No. 311, 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, 2023. 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 below, 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, 2023.

### **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 accompanying Schedule of Findings and Questioned Costs for the year ended August 31, 2023.

## **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 and in Finding 2023-002, the District did not comply with the requirements regarding 32.009 – COVID-19 – Emergency Connectivity Fund Program for allowable activities and costs, equipment and restricted purposes special tests 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.

### **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.

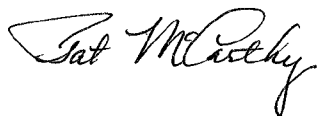
However, we identified certain deficiencies in internal control over compliance, as described in the accompanying Schedule of Federal Award Findings and Questioned Costs as Finding 2023-002 that we consider to be material weaknesses.

### **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

Olympia, WA

May 30, 2024

# INDEPENDENT AUDITOR'S REPORT

## Report on the Audit of the Financial Statements

### **Sultan School District No. 311 September 1, 2022 through August 31, 2023**

Board of Directors  
Sultan School District No. 311  
Sultan, Washington

## **REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS**

### **Unmodified and Adverse Opinions**

We have audited the financial statements of Sultan School District No. 311, as of and for the year ended August 31, 2023, 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 Sultan School District No. 311, as of the year ended August 31, 2023, 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 Sultan School District No. 311, as of August 31, 2023, 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.

## **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 May 30, 2024 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.

A handwritten signature in black ink that reads "Pat McCarthy". The signature is written in a cursive, flowing style.

Pat McCarthy, State Auditor

Olympia, WA

May 30, 2024

## **FINANCIAL SECTION**

### **Sultan School District No. 311 September 1, 2022 through August 31, 2023**

#### **FINANCIAL STATEMENTS**

Balance Sheet – Governmental Funds – 2023

Statement of Revenues, Expenditures and Changes in Fund Balance – Governmental  
Funds – 2023

Notes to Financial Statements – 2023

#### **SUPPLEMENTARY AND OTHER INFORMATION**

Schedule of Long-Term Liabilities – 2023

Schedule of Expenditures of Federal Awards – 2023

Notes to the Schedule of Expenditures of Federal Awards – 2023

Sultan School District No. 311  
Balance Sheet - Governmental Funds  
August 31, 2023

	General Fund	ASB Fund	Debt Service Fund	Capital Projects Fund	Transportation Vehicle Fund	Permanent Fund	Total
<b>Assets</b>							
Cash and Cash Equivalents	1,931,392.06	40,733.37	582.74	1,086,103.13	312,705.60	0.00	3,371,516.90
Minus Warrants Outstanding	-705,902.33	-2,460.71	0.00	-264,367.00	0.00	0.00	-972,730.04
Taxes Receivable	1,898,311.18		4,582.47	1,170,768.17	0.00		3,073,661.82
Due From Other Funds	294.99	14,318.16	0.00	0.00	0.00	0.00	14,613.15
Due From Other Governmental Units	302,147.34	0.00	0.00	0.00	0.00	0.00	302,147.34
Accounts Receivable	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Interfund Loans Receivable	0.00			0.00			0.00
Accrued Interest Receivable	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Inventory	0.00	0.00		0.00			0.00
Prepaid Items	0.00	0.00			0.00	0.00	0.00
Investments	848,661.02	148,131.51	127,200.00	3,480,990.48	78,559.01	0.00	4,683,542.02
Investments/Cash With Trustee	0.00		0.00	0.00	0.00	0.00	0.00
Investments-Deferred Compensation	0.00			0.00			0.00
Self-Insurance Security Deposit	0.00						0.00
<b>TOTAL ASSETS</b>	<b>4,274,904.26</b>	<b>200,722.33</b>	<b>132,365.21</b>	<b>5,473,494.78</b>	<b>391,264.61</b>	<b>0.00</b>	<b>10,472,751.19</b>
<b>DEFERRED OUTFLOWS OF RESOURCES:</b>							
Deferred Outflows of Resources - Other	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>TOTAL DEFERRED OUTFLOWS OF RESOURCES</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>TOTAL ASSETS AND DEFERRED OUTFLOWS OF RESOURCES</b>	<b>4,274,904.26</b>	<b>200,722.33</b>	<b>132,365.21</b>	<b>5,473,494.78</b>	<b>391,264.61</b>	<b>0.00</b>	<b>10,472,751.19</b>
<b>LIABILITIES</b>							
Accounts Payable	358,773.65	4,306.18	0.00	547,675.00	0.00	0.00	910,754.83
Contracts Payable Current	0.00	0.00		0.00	0.00	0.00	0.00
Accrued Interest Payable			0.00				0.00

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

Sultan School District No. 311  
Balance Sheet - Governmental Funds  
August 31, 2023

	General Fund	ASB Fund	Debt Service Fund	Capital Projects Fund	Transportation Vehicle Fund	Permanent Fund	Total
Accrued Salaries	0.00		0.00	0.00			0.00
Anticipation Notes Payable	0.00		0.00	2,500,000.00	0.00		2,500,000.00
<b>LIABILITIES:</b>							
Payroll Deductions and Taxes Payable	73,359.63		0.00	0.00			73,359.63
Due To Other Governmental Units	76,595.78		0.00	0.00	0.00	0.00	76,595.78
Deferred Compensation Payable	0.00			0.00			0.00
Estimated Employee Benefits Payable	0.00						0.00
Due To Other Funds	14,318.16	25.00	0.00	269.99	0.00	0.00	14,613.15
Interfund Loans Payable	0.00		0.00	0.00	0.00		0.00
Deposits	0.00	0.00		0.00			0.00
Unearned Revenue	0.00	0.00	0.00	0.00	0.00		0.00
Matured Bonds Payable			0.00				0.00
Matured Bond Interest Payable			0.00				0.00
Arbitrage Rebate Payable	0.00		0.00	0.00	0.00		0.00
<b>TOTAL LIABILITIES</b>	<b>523,047.22</b>	<b>4,331.18</b>	<b>0.00</b>	<b>3,047,944.99</b>	<b>0.00</b>	<b>0.00</b>	<b>3,575,323.39</b>
<b>DEFERRED INFLOWS OF RESOURCES</b>							
Unavailable Revenue	0.00	0.00	0.00	0.00	0.00		0.00
Unavailable Revenue - Taxes Receivable	1,898,311.18		4,582.47	1,170,768.17	0.00		3,073,661.82
<b>TOTAL DEFERRED INFLOWS OF RESOURCES</b>	<b>1,898,311.18</b>	<b>0.00</b>	<b>4,582.47</b>	<b>1,170,768.17</b>	<b>0.00</b>	<b>0.00</b>	<b>3,073,661.82</b>
<b>FUND BALANCE:</b>							
Nonspendable Fund Balance	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Restricted Fund Balance	649,394.12	196,391.15	127,782.74	1,631,256.88	391,264.61	0.00	2,996,089.50
Committed Fund Balance	0.00	0.00	0.00	296,116.08	0.00	0.00	296,116.08
Assigned Fund Balance	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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

Sultan School District No. 311

Balance Sheet - Governmental Funds

August 31, 2023

	General Fund	ASB Fund	Debt Service Fund	Capital Projects Fund	Transportation Vehicle Fund	Permanent Fund	Total
Unassigned Fund Balance	1,204,151.74	0.00	0.00	-672,591.34	0.00	0.00	531,560.40
<b>TOTAL FUND BALANCE</b>	<b>1,853,545.86</b>	<b>196,391.15</b>	<b>127,782.74</b>	<b>1,254,781.62</b>	<b>391,264.61</b>	<b>0.00</b>	<b>3,823,765.98</b>
<b>TOTAL LIABILITIES, DEFERRED INFLOW OF RESOURCES, AND FUND BALANCE</b>	<b>4,274,904.26</b>	<b>200,722.33</b>	<b>132,365.21</b>	<b>5,473,494.78</b>	<b>391,264.61</b>	<b>0.00</b>	<b>10,472,751.19</b>

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

Sultan School District No. 311

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

For the Year Ended August 31, 2023

	General Fund	ASB Fund	Debt Service Fund	Capital Projects Fund	Transportation Vehicle Fund	Permanent Fund	Total
<b>REVENUES:</b>							
Local	4,344,186.59	271,354.70	393.05	2,193,424.10	5,621.50		6,814,979.94
State	29,340,209.08		0.00	717,302.14	312,368.42		30,369,879.64
Federal	2,684,574.51		0.00	310,367.97	0.00		2,994,942.48
Other	12,165.40			0.00	0.00	0.00	12,165.40
<b>TOTAL REVENUES</b>	<b>36,381,135.58</b>	<b>271,354.70</b>	<b>393.05</b>	<b>3,221,094.21</b>	<b>317,989.92</b>	<b>0.00</b>	<b>40,191,967.46</b>
<b>EXPENDITURES:</b>							
<b>CURRENT:</b>							
Regular Instruction	18,379,166.76						18,379,166.76
Special Education	5,652,953.18						5,652,953.18
Vocational Education	1,402,734.48						1,402,734.48
Skill Center	0.00						0.00
Compensatory Programs	2,576,578.09						2,576,578.09
Other Instructional Programs	73,540.37						73,540.37
Federal Stimulus COVID-19	700,475.70						700,475.70
Community Services	0.00						0.00
Support Services	8,045,981.69						8,045,981.69
Student Activities/Other		262,418.37				0.00	262,418.37
<b>CAPITAL OUTLAY:</b>							
Sites				8,360.86			8,360.86
Building				5,563,638.01			5,563,638.01
Equipment				656,616.11			656,616.11
Instructional Technology				326,973.97			326,973.97
Energy				0.00	0.00		0.00
Transportation Equipment					120,944.34		120,944.34
Sales and Lease				0.00			0.00
Other	263,523.10						263,523.10
<b>DEBT SERVICE:</b>							
Principal	20,420.49		182,457.78	0.00	0.00		202,878.27

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



Sultan School District No. 311

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

For the Year Ended August 31, 2023

	General Fund	ASB Fund	Debt Service Fund	Capital Projects Fund	Transportation Vehicle Fund	Permanent Fund	Total
Interest and Other Charges	385.68		50,682.04	0.00	0.00		51,067.72
Bond/Levy Issuance				17,250.00	0.00		17,250.00
<b>TOTAL EXPENDITURES</b>	<b>37,115,759.54</b>	<b>262,418.37</b>	<b>233,139.82</b>	<b>6,572,838.95</b>	<b>120,944.34</b>	<b>0.00</b>	<b>44,305,101.02</b>
REVENUES OVER (UNDER) EXPENDITURES	-734,623.96	8,936.33	-232,746.77	-3,351,744.74	197,045.58	0.00	-4,113,133.56
<b>OTHER FINANCING SOURCES (USES) :</b>							
Bond Sales & Refunding Bond Sales	0.00		0.00	2,750,000.00	0.00		2,750,000.00
Long-Term Financing	88,300.48			0.00	0.00		88,300.48
Transfers In	200,695.99		232,770.00	0.00	0.00		433,465.99
Transfers Out (GL 536)	-97,480.00		0.00	-335,986.00	0.00	0.00	-433,466.00
Other Financing Uses (GL 535)	0.00		0.00	0.00	0.00		0.00
Other	0.00		0.00	0.00	0.00		0.00
<b>TOTAL OTHER FINANCING SOURCES (USES)</b>	<b>191,516.47</b>		<b>232,770.00</b>	<b>2,414,014.00</b>	<b>0.00</b>	<b>0.00</b>	<b>2,838,300.47</b>
<b>EXCESS OF REVENUES/OTHER FINANCING SOURCES OVER (UNDER) EXPENDITURES AND OTHER FINANCING USES</b>	<b>-543,107.49</b>	<b>8,936.33</b>	<b>23.23</b>	<b>-937,730.74</b>	<b>197,045.58</b>	<b>0.00</b>	<b>-1,274,833.09</b>
<b>BEGINNING TOTAL FUND BALANCE</b>	<b>2,396,653.35</b>	<b>187,454.82</b>	<b>127,759.51</b>	<b>2,192,512.36</b>	<b>194,219.03</b>	<b>0.00</b>	<b>5,098,599.07</b>
Prior Year(s) Corrections or Restatements	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>ENDING TOTAL FUND BALANCE</b>	<b>1,853,545.86</b>	<b>196,391.15</b>	<b>127,782.74</b>	<b>1,254,781.62</b>	<b>391,264.61</b>	<b>0.00</b>	<b>3,823,765.98</b>

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

**SULTAN SCHOOL DISTRICT**  
**Notes to the Financial Statements**  
**September 1, 2022 Through August 31, 2023**

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

The Sultan School District (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.

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

Transportation Vehicle Fund. 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.

## **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.

Nonspendable Fund Balance. 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.

Restricted Fund Balance. 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.

Committed Fund Balance. 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.

Assigned Fund Balance. 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 Fiscal Services are the only persons who have the authority to create Assignments of fund balance.

Unassigned Fund Balance. 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.

## **Capitalization Threshold for Leases and Subscription-Based Information Technology Arrangements (SBITAs)**

The District follows the modified accrual basis of accounting in its treatment of leases and SBITAs. Agreements are evaluated regarding the lease term, payments, and discount rates as well as materiality to the District's financial position. The District's capitalization threshold for recognition of leases and SBITAs is \$10,000. Arrangements that are considered short term or do not meet capitalization thresholds are treated as revenues and expenditures in the current year.

## **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.

### **Subscription-Based Information Technology Arrangements (SBITA)**

For the year ended August 31, 2023, the district implemented guidance for the presentation and disclosures of Subscription-Based Information Technology Arrangements (SBITA), as required by the School District Accounting Manual. These changes were in response to the provisions of GASB Statement No. 96.

## **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 Snohomish 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, 2023, are as follows:

Type of Investment	Sultan's own investments	Investments held by Sultan as an agent for other organizations	Total
State Treasurer's Investment Pool (all funds)	\$4,683,542	\$0	\$4,683,542

The District is a participant in the Local Government Investment Pool (LGIP). The LGIP was authorized by Chapter 294, Laws of 1986, and is managed and operated by the Washington State Treasurer. The State Finance Committee is the administrator of the statute that created the LGIP and adopts rules. The State Treasurer is responsible for establishing the investment policy for the LGIP and reviews the policy annually; proposed changes are reviewed by the LGIP Advisory Committee.

The LGIP is an unrated external investment pool. Investments in the Pool are reported at amortized cost, which approximates fair value. The Pool is invested in manner that meets the maturity, quality, diversification, and liquidity requirements set forth by generally accepted accounting principles for external investment pools that elect to measure, for financial reporting purposes, investments at amortized cost. The Pool does not have any legally binding guarantees of share values.

The Pool does not impose liquidity fees or redemption gates on participant withdrawals. It is the policy of the Pool to permit participants to withdraw their investments on a daily basis; therefore, the District's investment balance in the Pool is equal to fair value. Fair value is measured using quoted prices in active markets for identical assets that the pool can access at the measurement date (Level 1 Inputs). Observable markets include exchange markets, dealer markets, brokered markets and principal-to-principal markets.

The Office of the State Treasurer prepares a stand-alone LGIP financial report. A copy of the report is available from the Office of the State Treasurer, PO Box 40200, Olympia, Washington 98504-0200, online at <http://www.tre.wa.gov>.

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

**Litigation** – no known legal matters that might materially impact 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 school district, however, continues to operate, educating students using continuous learning models. Many of the precautionary measures put in place during the 2019–20 school year remain in effect; and are affecting the district for the 2023–2024 school year in new ways.

The direct and indirect impacts of operations of the district are summarized below:

Due to the COVID-19 pandemic, the district experienced a significant decrease in enrollment during 2020–21. Return to in-person learning for 2021–22 has seen a rebound in enrollment to pre-pandemic levels, the educational and social/emotional needs of students has increased dramatically. The district has needed to hire additional staff to address these needs. For 2022–23 we have seen a return to pre-pandemic learning environments but the educational/mental impacts on students remain. The length of time the district will need to deal with this extraordinary needs is unknown at this time.

## **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, 2023				
	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	11,508,253,000	9,225,521,000	2,282,732,000	80.16%
SERS 2/3	9,283,864,000	9,427,008,000	(143,144,000)	101.54%
TRS 1	8,491,576,000	7,225,059,000	1,266,517,000	85.09%
TRS 2/3	24,937,867,000	25,060,682,000	(122,815,000)	100.49%

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 Comprehensive Financial Report](#) or <http://www.drs.wa.gov>.

### **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 & 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 Chapters 41.32 and 41.34 RCW. TRS eligibility for membership requires service as a certificated, public-school employee working in an instructional, administrative, or supervisory capacity. 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 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 a single plan for accounting purposes.

TRS Plan 1 provides retirement, disability, and death benefits. Retirement benefits are calculated using 2% of the member's Average Final Compensation (AFC) times the member's years of service – up to a maximum of 60%. AFC is the average of the member's two consecutive highest-paid fiscal years.

Members are eligible for retirement at any age after 30 years of service, 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).

TRS Plan 2/3 provides retirement, disability and death benefits. Retirement benefits for Plan 2 are calculated using 2% of the member's Average Final Compensation (AFC) times the member's years of service. Retirement defined benefits for Plan 3 are calculated using 1% of AFC times the member's years of service. AFC is the monthly average of the member's 60 consecutive highest-paid service credit months. TRS Plan 2/3 has no cap on years of service credit.

Members are eligible for retirement with a full benefit at age 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 retirement benefits are actuarially reduced to reflect the choice of a survivor benefit.

Other TRS Plan 2/3 benefits include a Cost-of-Living Adjustment (COLA) based on the Consumer Price Index, capped at 3% annually.

Annuities purchased with plan 3 defined contributions that are invested within the WSIB TAP are considered defined benefits. Plan 3 WSIB TAP annuities are actuarially reduced if a survivor benefit is chosen and TAP annuities include a COLA of 3% annually.

TRS Plan 3 defined contribution benefits are totally dependent on employee contributions and investment earnings on those contributions. Members are eligible to withdraw their defined contribution upon separation. Members have multiple withdrawal options, including purchase of an annuity.

#### PERS Plan Information

PERS was established in 1947, and its retirement benefit provisions are contained in Chapters 41.34 and 41.40 RCW. PERS is a cost-sharing, multiple-employer retirement system. PERS Plan 1 provides retirement, disability, and death benefits. Retirement benefits are determined as 2% times the member's Average Final Compensation (AFC) times the member's years of services. 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.

PERS Plan 1 retirement benefits are actuarially reduced if a survivor benefit is chosen. Members retiring from inactive status before age 65 may also receive actuarially reduced benefits. Other benefits include an optional Cost-of-Living Adjustment (COLA).

#### 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 Chapters 41.34 and 41.35 RCW. SERS members include classified employees of school districts and educational service districts.

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.

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 a single plan for accounting purposes.

SERS provides retirement, disability, and death benefits. Retirement benefits for Plan 2 are calculated as 2% times the member's Average Final Compensation (AFC) times the member's years of service. Defined benefits for Plan 3 are calculated using 1% times the member's AFC times the member's years of service. AFC is the monthly average of the member's 60 consecutive highest-paid service credit months.

Members are eligible for retirement with a full benefit at age 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 Plan 2/3 retirement benefits are actuarially reduced if a survivor benefit is chosen.

Other SERS Plan 2/3 benefits include a Cost-of-Living Adjustment (COLA) based on the Consumer Price Index, capped at 3% annually.

SERS 3 defined contributions benefits are totally dependent on employee contributions and the investment earnings on those contributions. Annuities purchased with plan 3 defined contributions that are invested within the WSIB TAP are considered defined benefits. Plan 3 WSIB TAP annuities are actuarially reduced if a survivor benefit is chosen and TAP annuities include a 3% annually.

## 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 state statute in accordance with Chapters 41.40 and 41.45 RCW for PERS, Chapters 41.35 and 41.45 RCW for SERS, and Chapters 41.32 and 41.45 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, 2022. PERS contribution rates changed on July 1, 2023. The pension plan contribution rates (expressed as a percentage of covered payroll) for fiscal year 2023 are listed below:

	From this date	Through this date	Member rate	Employer rate	
<b>PERS 1</b>	7/1/2022	6/30/2023	6.00%	10.39%	
<b>PERS 1</b>	7/1/2023	8/31/2023	6.00%	9.39%	
<b>SERS 2</b>	9/1/2022	8/31/2023	7.76%	11.79%	
<b>SERS 3</b>	9/1/2022	8/31/2023	*	11.79%	**
<b>TRS 1</b>	9/1/2022	8/31/2023	6.00%	14.69%	
<b>TRS 2</b>	9/1/2022	8/31/2023	8.05%	14.69%	

	From this date	Through this date	Member rate	Employer rate	
<b>TRS 3</b>	9/1/2022	8/31/2023	*	14.69%	**
<i>Note: The Employer rates include .0018 DRS administrative expense.</i>					
* – TRS and SERS Plan 3 Employee Contribution Variable from 5% to 15% based on rate selected by the employee member.					
** – TRS and SERS Plan 2/3 Employer Contributions for defined benefit portion only.					

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

At June 30, 2023, the school district reported a total liability of \$2,986,602 for its proportionate shares of the individual plans' collective net pension liability and \$476,599 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, 2023 the district's proportionate share of each plan's net pension liability is reported below:

June 30, 2023	PERS 1	SERS 2/3	TRS 1	TRS 2/3
District's Annual Contributions	216,038	437,946	964,325	1,209,646
Proportionate Share of the Net Pension Liability (Asset)	723,707	-257,048	2,262,895	-219,551

At June 30, 2023, 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	0.031704%	0.179573%	0.178671%	0.178765%
Prior year proportionate share	0.032453%	0.179030%	0.168869%	0.171317%
Net difference percentage	-0.000750%	0.000543%	0.009802%	0.007448%

### **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, 2022, with the results rolled forward to June 30, 2023, 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, 2022, 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 2022 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, 2021, 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 was 2.20% and represents WSIB's long-term estimate of broad economic inflation consistent with their 2021 CMAs.

#### 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 or (asset).

### **Sensitivity of the Net Pension Liability (Asset) to changes in the Discount Rate**

The following table presents the Sultan 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.

<b>Sensitivity of the Net Pension Liability or Asset to Changes in the Discount Rate</b>			
	1% Decrease (6.00%)	Current Discount Rate (7.00%)	1% Increase (8.00%)
<b>PERS 1</b>	<b>\$3,189,149,000</b>	<b>\$2,282,732,000</b>	<b>\$1,491,643,000</b>
Allocation Percentage	0.031704%	0.031704%	0.031704%
Proportionate Share	<b>\$1,011,074</b>	<b>\$723,707</b>	<b>\$472,904</b>
<b>SERS 2/3</b>	<b>\$1,168,408,000</b>	<b>(\$143,144,000)</b>	<b>(\$1,224,160,000)</b>
Allocation Percentage	0.179573%	0.179573%	0.179573%
Proportionate Share	<b>\$2,098,149</b>	<b>(\$257,048)</b>	<b>(\$2,198,264)</b>
<b>TRS 1</b>	<b>\$1,927,853,000</b>	<b>\$1,266,517,000</b>	<b>\$688,424,000</b>
Allocation Percentage	0.178671%	0.178671%	0.178671%
Proportionate Share	<b>\$3,444,509</b>	<b>\$2,262,895</b>	<b>\$1,230,012</b>

<b>Sensitivity of the Net Pension Liability or Asset to Changes in the Discount Rate</b>			
	1% Decrease (6.00%)	Current Discount Rate (7.00%)	1% Increase (8.00%)
<b>TRS 2/3</b>	<b>\$3,965,509,000</b>	<b>\$(122,815,000)</b>	<b>\$(3,446,561,000)</b>
Allocation Percentage	0.178765%	0.178765%	0.178765%
Proportionate Share	<b>\$7,088,953</b>	<b>(\$219,551)</b>	<b>(\$6,161,254)</b>

## **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.<sup>(5)</sup>

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 29) 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 2023.

<b>Members not eligible for Medicare</b>			
<b>(or enrolled in Part A only)</b>	<b>Type of Coverage</b>		
<b>Descriptions</b>	<b>Employee</b>	<b>Employee &amp; Spouse</b>	<b>Full Family</b>
Kaiser Permanente NW Classic	\$841.77	\$1,678.60	\$2,306.22
Kaiser Permanente NW CDHP	\$700.40	\$1,394.80	\$1,870.59
Kaiser Permanente WA Classic	\$836.57	\$1,668.20	\$2,291.92
Kaiser Permanente WA CDHP	\$699.88	\$1,393.04	\$1,869.16
Kaiser Permanente WA Sound Choice	\$715.63	\$1,426.32	\$1,959.34
Kaiser Permanente WA Value	\$764.09	\$1,523.24	\$2,092.60
UMP Classic	\$805.36	\$1,605.78	\$2,206.10
UMP Select	\$729.13	\$1,453.32	\$1,996.46
UMP CDHP	\$704.42	\$1,402.12	\$1,881.65
UMP Plus-Puget Sound High Value Network	\$766.95	\$1,528.96	\$2,100.47
UMP Plus-UW Medicine Accountable Care Network	\$766.95	\$1,528.96	\$2,100.47

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.

<b>Members enrolled in Part A and B of Medicare</b>	<b>Type of Coverage</b>		
<b>Descriptions</b>	<b><u>Employee</u></b>	<b><u>Employee &amp; Spouse<sup>1</sup></u></b>	<b><u>Full Family<sup>1</sup></u></b>
Kaiser Permanente NW Senior Advantage	\$176.13	\$347.32	\$974.94
Kaiser Permanente WA Medicare Plan	\$174.59	\$344.24	N/A
Kaiser Permanente WA Classic	N/A	N/A	\$967.96
Kaiser Permanente WA Sound Choice	N/A	N/A	\$877.26
Kaiser Permanente WA Value	N/A	N/A	\$913.60
UMP Classic	\$438.34	\$871.74	\$1,472.06

Note 1: Employee-Spouse and Full Family with two Medicare eligible subscribers.

#### 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 post-employment health care benefits.

For the fiscal year 2022-23, the Sultan School District paid \$3,344,764 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 of August 31, 2023, the district had the following lease obligations:

Lessor/Equipment/Location	Annual Payments	Final Installment Date	Balance
<b>Lease-Purchase Commitments</b>			
QBSI – Xerox B8075 (D.O.)	\$1,996.20	05/2024	1,633.56

QBSI – Xerox C8045 (D.O.)	\$1,996.20	05/2024	1,633.56
QBSI – Xerox D95 (M&O)	\$1,996.20	05/2024	1,633.56
QBSI – Xerox D95 (G.B.E.)	\$1,996.20	05/2024	1,633.56
QBSI – Xerox D95 (S.E.S.)	\$1,996.20	05/2024	1,633.56
QBSI – Xerox D95 (S.M.S.)	\$1,996.20	05/2024	1,633.56
QBSI – Xerox D95 (S.H.S.)	\$1,996.20	05/2024	1,633.56
Enterprise – 2022 F-350	\$14,031.60	05/2028	52,924.51
Enterprise – 2022 Escape	\$7,934.28	05/2028	28,543.20
Total Lease Commitments			92,902.63

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

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

The District rents to a tenant a mobile home on property acquired in 2018. Monthly rental proceeds are delivered into Capital Projects fund. Note, the property is managed by a firm who provides to the district monthly the gross rental proceeds less cost of utilities and their fee. The district has no immediate plans for the property. The district recently received notification that the tenant has passed away. The district has no plans to re-rent the home nor use the property for any other purpose at this time:

Rental income for the fiscal year ended August 31, 2023 is detailed below:

	Rental Income	Additional Income
Rental Income – Mobile Home (net of fees)	\$7,670	n/a

### **NOTE 8: OTHER SIGNIFICANT COMMITMENTS**

The District has active construction projects as of August 31, 2023:

Project	Project Authorization Amount	Expended as of 8/31/23	Additional Local Funds Committed	Additional State Funds Committed
Transportation Cooperative Facility	\$8,513,074 (total cost)	\$4,525,022 (total exp since beg.)	\$609,540 (remaining district contrib.)	\$0

### **NOTE 9: REQUIRED DISCLOSURES ABOUT CAPITAL ASSETS**

The District's capital assets are insured in the amount of \$88,575,804 for fiscal year 2023. In the opinion of the District's insurance consultant, the amount is sufficient to adequately fund replacement of the District's assets.

## **NOTE 10: SHORT-TERM DEBT**

### **Short-Term Debt**

Short-term debt activity for the year ended August 31, 2023, was as follows:

	Beginning Balance	Issued	Redeemed	Ending Balance
Tax Anticipation Note – For Transportation Co-Op Project	\$0	\$2,500,000	\$0	\$2,500,000

## **NOTE 11: LONG-TERM DEBT**

### **Long-Term Debt**

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, 2023.

The following is a summary of changes in long-term debt of the District for the fiscal year ended August 31, 2023:

Governmental activities	Balance at Sept. 1, 2022	Increases	Decreases	Balance at Aug. 31, 2023	Due within One Year
General Obligation Bonds	2,207,017	2,750,000	182,458	4,774,559	370,362

Long-term debt at August 31, 2023, are comprised of the following individual issues:

Issue Name	Amount Authorized	Annual Installments	Final Maturity	Interest Rate(s)	Amount Outstanding
<b>General Obligation Bonds</b>					
LGO Bonds	\$1,200,000	73,589.32	06/01/2030	2.3% - 2.4%	983,427.86
LGO Bonds	\$1,150,000	108,868.46	12/01/2031	2.15% - 2.45%	1,041,131.54
LGO Bonds	\$2,750,000	0.00	06/01/2029	3.93%	2,750,000
<b>Total</b>	<b>\$5,100,000</b>	<b>\$182,457.78</b>			<b>\$4,774,559.40</b>

Debt service requirements on long-term debt as of August 31, 2023, are as follows:

	Bonds		Notes from Direct Borrowings and Direct Placements		
Years Ending August 31	Principal	Interest	Principal	Interest	Total
2024	75,291.61 113,512.53 181,557.92	22,188.39 21,777.47 103,872.08	0	0	\$518,200.00
2025	77,033.27 115,966.18 474,537.19	20,446.73 19,323.82 96,322.81	0	0	\$803,630.00
2026	77,998.73 118,472.85 493,369.73	19,481.27 16,817.15 77,490.27	0	0	\$803,630.00
2027	79,881.93 120,084.23 512,949.66	17,598.07 15,205.77 57,910.34	0	0	\$803,630.00
2028	81,810.60 121,991.81 533,306.64	15,669.40 13,298.19 37,553.36	0	0	\$803,630.00
2029 - 2031	169,594.60 451,103.94 554,278.86	25,365.40 22,371.77 16,388.48	0	0	\$1,239,103.05
Total	\$4,352,742.28	\$619,080.77	0	0	\$4,971,823.05

At August 31, 2023, the District had \$127,783 available in the Debt Service Fund to service the general obligation bonds.

## **NOTE 12: 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
Capital Projects	General Fund	\$200,696	Reimbursement for staffing costs related to tech levy
Capital Projects	Debt Service Fund	\$135,290	Annual LGO (2022) pmts
General Fund	Debt Service Fund	\$97,480	Annual LGO (2020) pmts

## **NOTE 13: ENTITY RISK MANAGEMENT ACTIVITIES**

The district is a member of the Washington Schools Risk Management Pool (WSRMP). Chapter 48.62 RCW authorizes the governing body of any one or more governmental entities to form together into or join a pool 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 hire 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. WSRMP was formed in 1986 when educational service districts and school districts in the state of Washington joined by signing the Cooperative Risk Management Pool Account Agreement (Account Agreement) to pool their self-insured losses and jointly purchase insurance and administrative services. Over 90 school and educational service districts have joined WSRMP.

WSRMP allows members to jointly purchase insurance coverage, establish a plan of self-insurance, and provide related services, such as risk management. WSRMP provides the following coverages for its members: property, liability, vehicle, school board liability, crime, employment practices, errors and omissions, equipment breakdown, cyber security, crisis/active shooter coverage, and stop gap liability.

Members make an annual contribution to fund WSRMP. WSRMP purchases reinsurance and excess insurance from unrelated carriers subject to a per-occurrence self-insured retention of \$1 million for property risk \$2M for liability risk shared by WSRMP. Reinsurance or Excess carriers cover losses over the self-insured retention to the maximum limits of each Coverage Agreement. Since WSRMP is a cooperative program, there is a joint liability among the participating members.

Members contract to remain in WSRMP for a minimum of three years and must give notice three years before terminating participation. The Account Agreement is renewed automatically each year after the initial three-year period. Even after termination, a member is still responsible for their share of contributions to WSRMP for any unresolved, unreported, and in-process claims for the period in which they were a signatory to the Account Agreement.

WSRMP is fully funded by its member participants and is governed by a board of directors that consists of one designated representative from each participating member. An executive board is elected at the annual meeting and is responsible for overseeing the business affairs of WSRMP.

## **Washington Schools Risk Management Pool**

<b>Purpose</b>	To provide risk sharing and related services to member school districts.
<b>Participants</b>	78 school districts, 5 educational service districts, and 6 interlocal cooperatives.
<b>Governing Board</b>	16 member Executive Board.

### **Condensed Financial Information** (Most recent financials available)

	<b>August 31, 2023 *</b>
Total Assets	\$ 121,295,763
Deferred Outflows	770,303
Total Liabilities	105,231,472
Deferred Inflows	422,044
Ending Net Position	<u>\$ 16,412,550</u>
<hr/>	
Total Revenues	\$ 93,816,540
Total Expenses	92,997,018
OPERATING INCOME / (LOSS)	<u>\$ 819,521</u>
CHANGE IN NET POSITION	<u>\$ 819,521</u>
<hr/>	
Beginning Net Position	\$ 15,585,177
GASB change in accounting	7,852
Beginning Net Position - Restated	\$ 15,593,029
OPERATING INCOME / (LOSS)	819,521
Ending Net Position	<u>\$ 16,412,550</u>

**\* Unaudited**

## **NOTE 14: 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 15: JOINT VENTURES AND JOINTLY GOVERNED ORGANIZATIONS**

### **King County Director's Association**

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 March 28, 1974, and has remained in the joint venture ever since. The District's current equity of \$30,085.68 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 16: 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	Trans. Vehicle Fund
Restricted Fund Balance					
For Fund Purpose		\$196,391			\$391,264
For Carryover of Restricted Revenues	\$313,038				
For Carryover of Food Service Revenue	\$238,877				
For Debt Service	\$97,480		\$420,720	\$127,783	
Restricted from Bond Proceeds					
Restricted from Impact Fee Proceeds			\$1,210,537		
Committed Fund Balance					
Committed from Levy Proceeds			\$296,116		
Assigned Fund Balance					
Fund Purposes					
Unassigned Fund Balance	\$-276,947		-\$672,591		
Unassigned MFBP	\$1,481,098				



## **NOTE 17: 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 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. For the year ended August 31, 2023, the District made \$6,500 in discretionary employer contributions to the plan.

### **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 \$25.00/mo. 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, 2023 the District made \$44,775.00 in matching employer contributions to the plan.)

## **NOTE 18: 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 vesting 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.

Employees earn sick leave at a rate of 12 days per year up to a maximum of one contract year. The District has not adopted the buyout provisions for sick leave as authorized under RCW 28A.400.210. As such, no liability exists for buy out of sick leave.

Sultan School District No. 311

Schedule of Long-Term Liabilities

For the Year Ended August 31, 2023

Description	Beginning Outstanding Debt September 1, 2022	Amount Issued / Increased	Amount Redeemed / Decreased	Ending Outstanding Debt August 31, 2023	Amount Due Within One Year
<b>Voted Debt</b>					
Voted Bonds	0.00	0.00	0.00	0.00	0.00
LOCAL Program Proceeds Issued in Lieu of Bonds	0.00	0.00	0.00	0.00	0.00
<b>Non-Voted Debt and Liabilities</b>					
Non-Voted Bonds	2,207,017.18	2,750,000.00	182,457.78	4,774,559.40	370,362.06
LOCAL Program Proceeds	0.00	0.00	0.00	0.00	0.00
Leases	25,408.32	88,300.48	20,806.17	92,902.63	31,513.44
Contracts Payable	0.00	0.00	0.00	0.00	0.00
Claims & Judgements	0.00	0.00	0.00	0.00	0.00
Compensated Absences	569,035.16	143,369.16	0.00	712,404.32	622,324.72
Long-Term Notes	0.00	0.00	0.00	0.00	0.00
Anticipation Notes Payable	0.00	2,500,000.00	0.00	2,500,000.00	2,500,000.00
Lines of Credit	0.00	0.00	0.00	0.00	0.00
Other Non-Voted Debt	0.00	0.00	0.00	0.00	0.00
<b>Other Liabilities</b>					
<b>Non-Voted Notes Not Recorded as Debt</b>	0.00	0.00	0.00	0.00	0.00
Net Pension Liabilities:					
Net Pension Liabilities TRS 1	3,211,598.00	0.00	948,703.00	2,262,895.00	
Net Pension Liabilities TRS 2/3	0.00	0.00	0.00	0.00	
Net Pension Liabilities SERS 2/3	0.00	0.00	0.00	0.00	
Net Pension Liabilities PERS 1	903,614.00	0.00	179,907.00	723,707.00	
<b>Total Long-Term Liabilities</b>	<b>6,916,672.66</b>	<b>5,481,669.64</b>	<b>1,331,873.95</b>	<b>11,066,468.35</b>	<b>3,524,200.22</b>

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

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

**Sultan School District No. 311**  
**Schedule of Expenditures of Federal Awards**  
**For the Year Ended August 31, 2023**

Federal Agency (Pass-Through Agency)	Federal Program	ALN Number	Other Award Number	Expenditures			Passed through to Subrecipients	Note
				From Pass- Through Awards	From Direct Awards	Total		
<b>Child Nutrition Cluster</b>								
FOOD AND NUTRITION SERVICE, AGRICULTURE, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	School Breakfast Program	10.553	n/a	126,212	-	126,212	-	
FOOD AND NUTRITION SERVICE, AGRICULTURE, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	National School Lunch Program	10.555	n/a	83,104	-	83,104	-	3
FOOD AND NUTRITION SERVICE, AGRICULTURE, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	National School Lunch Program	10.555	n/a	70,749	-	70,749	-	
FOOD AND NUTRITION SERVICE, AGRICULTURE, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	National School Lunch Program	10.555	n/a	514,131	-	514,131	-	
			<b>Total ALN 10.555:</b>	<b>667,984</b>	<b>-</b>	<b>667,984</b>	<b>-</b>	
FOOD AND NUTRITION SERVICE, AGRICULTURE, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	Summer Food Service Program for Children	10.559	n/a	5,480	-	5,480	-	
			<b>Total Child Nutrition Cluster:</b>	<b>799,676</b>	<b>-</b>	<b>799,676</b>	<b>-</b>	
FOOD AND NUTRITION SERVICE, AGRICULTURE, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	Child and Adult Care Food Program	10.558	n/a	46,964	-	46,964	-	

*The accompanying notes are an integral part of this schedule.*

**Sultan School District No. 311**  
**Schedule of Expenditures of Federal Awards**  
**For the Year Ended August 31, 2023**

Federal Agency (Pass-Through Agency)	Federal Program	ALN Number	Other Award Number	Expenditures			Passed through to Subrecipients	Note
				From Pass- Through Awards	From Direct Awards	Total		
Forest Service Schools and Roads Cluster								
FOREST SERVICE, AGRICULTURE, DEPARTMENT OF (via WA State Treasurer)	Schools and Roads - Grants to States	10.665	n/a	4,813	-	4,813	-	
Total Forest Service Schools and Roads Cluster:				4,813	-	4,813	-	
FEDERAL COMMUNICATIONS COMMISSION, FEDERAL COMMUNICATIONS COMMISSION	COVID 19 - Emergency Connectivity Fund Program	32.009	-	-	375,768	375,768	-	
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	Title I Grants to Local Educational Agencies	84.010	GT-00135	319,952	-	319,952	-	5
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	Title I Grants to Local Educational Agencies	84.010	0271517	27,945	-	27,945	-	5
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	Title I Grants to Local Educational Agencies	84.010	0271135	30,000	-	30,000	-	5
Total ALN 84.010:				377,897	-	377,897	-	
Special Education Cluster (IDEA)								

The accompanying notes are an integral part of this schedule.

**Sultan School District No. 311**  
**Schedule of Expenditures of Federal Awards**  
**For the Year Ended August 31, 2023**

Federal Agency (Pass-Through Agency)	Federal Program	ALN Number	Other Award Number	Expenditures			Note
				From Pass- Through Awards	From Direct Awards	Passed through to Subrecipients	
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	Special Education Grants to States	84.027	84.027X 0307869	501,993	-	-	7
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	Special Education Grants to States	84.027	GT-00629	20,919	-	-	7
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	COVID 19 - Special Education Grants to States	84.027	84.027X 0312389	86,391	-	-	7
<b>Total ALN 84.027:</b>				<b>609,303</b>	-	-	
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	Special Education Preschool Grants	84.173	84.173X 0367255	22,272	-	-	7
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	COVID 19 - Special Education Preschool Grants	84.173	84.173X 0371328	7,329	-	-	5

*The accompanying notes are an integral part of this schedule.*

**Sultan School District No. 311**  
**Schedule of Expenditures of Federal Awards**  
**For the Year Ended August 31, 2023**

Federal Agency (Pass-Through Agency)	Federal Program	ALN Number	Other Award Number	Expenditures			Passed through to Subrecipients	Note
				From Pass- Through Awards	From Direct Awards	Total		
			Total ALN 84.173:	29,601	-	29,601	-	
			Total Special Education Cluster (IDEA):	638,904	-	638,904	-	
Office of Career, Technical, and Adult Education, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	Career and Technical Education -- Basic Grants to States	84.048	0176206	12,959	-	12,959	-	7
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	English Language Acquisition State Grants	84.365	GT-00135	20,097	-	20,097	-	5
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	Supporting Effective Instruction State Grants (formerly Improving Teacher Quality State Grants)	84.367	GT-00135	62,821	-	62,821	-	5
EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	COVID 19 - Education Stabilization Fund	84.425	84.425D 0120410	22,170	-	22,170	-	6
EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	COVID 19 - Education Stabilization Fund	84.425	84.425U 0138161	555,534	-	555,534	-	7

*The accompanying notes are an integral part of this schedule.*

**Sultan School District No. 311**  
**Schedule of Expenditures of Federal Awards**  
**For the Year Ended August 31, 2023**

	Federal Agency (Pass-Through Agency)	Federal Program	ALN Number	Other Award Number	Expenditures			Passed through to Subrecipients	Note
					From Pass- Through Awards	From Direct Awards	Total		
	EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via WA State Office of Superintendent of Public Instruction)	COVID 19 - Education Stabilization Fund	84.425	84.425U 0137189	21,951	-	21,951	-	7
	EDUCATION, DEPARTMENT OF, EDUCATION, DEPARTMENT OF (via United States Department of Education)	COVID 19 - Education Stabilization Fund	84.425	84.425D 0144561	3,676	-	3,676	-	
					<b>603,331</b>	<b>-</b>	<b>603,331</b>	<b>-</b>	
				<b>Total ALN 84.425:</b>	<b>2,567,462</b>	<b>375,768</b>	<b>2,943,230</b>	<b>-</b>	

*The accompanying notes are an integral part of this schedule.*



## **NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**

### **NOTE 1—BASIS OF ACCOUNTING**

The Schedule of Expenditures of Federal Awards is prepared on the same basis of accounting as the Sultan School District's financial statements. The Sultan 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—PROGRAM COSTS/MATCHING CONTRIBUTIONS**

The amounts shown as current year expenses represent only the federal grant portion of the program costs. Entire program costs, including the district's local matching share, may be more than shown. Such expenditures are recognized following, as applicable, either the cost principles in the OMB Circular A-87, Cost Principles for State, Local, and Indian Tribal Governments, or 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 3—NONCASH AWARDS**

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

### **NOTE 4—SCHOOLWIDE & TARGETED PROGRAMS**

The Sultan School District operates "schoolwide" programs. 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 Sultan School District in its schoolwide programs: Title I (84.010) \$312,860.

### **NOTE 5—FEDERAL INDIRECT RATE**

The Sultan School District used the federal restricted rate of 4.94%. The Sultan School District has not elected to use the 10-percent de minimis indirect cost rate allowed under the Uniform Guidance.

### **NOTE 6—INDIRECT RATE**

The indirect rate published in conjunction with this grant was 11.8%. However, the Sultan School District elected to claim less at approx. 5.0% for this grant.

### **NOTE 7—INDIRECT RATE**

The restricted indirect rate for this grant was 4.94%. However, the Sultan School District elected to not claim indirects for this grant.



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Board of Directors:  
Cigi Gaudner  
Isaac Hudry  
Mike Varnell  
Marianne Naslund  
Dave Shepherd

Don Chaplik, Superintendent

## CORRECTIVE ACTION PLAN FOR FINDINGS REPORTED UNDER UNIFORM GUIDANCE

### Sultan School District No. 311 September 1, 2022 through August 31, 2023

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).

<b>Finding ref number:</b> 2023-001	<b>Finding caption:</b> The District's internal controls were inadequate for ensuring accurate reporting of its Schedule of Expenditures of Federal Awards.
<b>Name, address, and telephone of District contact person:</b> Daniel C. Baller – Director of Fiscal Services – (360) 793-9800 x 1020	
<b>Corrective action the auditee plans to take in response to the finding:</b> <i>Moving forward, the district now has additional staff in the Fiscal Department who can provide a more in-depth review of the SEFA and its preparation prior to presentation to the Superintendent for final approval. The District feels this additional review alleviate such issues moving forward.</i>	
<b>Anticipated date to complete the corrective action:</b> This process to be implemented for 23/24 SEFA development/reporting – Fall 2024	

<b>Finding ref number:</b> 2023-002	<b>Finding caption:</b> The District did not have adequate internal controls for ensuring compliance with allowable activities and costs, equipment and restricted purpose requirements.
<b>Name, address, and telephone of District contact person:</b> Dave Moon – Director of Information Technology – (360) 793-9820 x 1110	
<b>Corrective action the auditee plans to take in response to the finding:</b> <i>As a result of this review the district now understands the extensive requirements of ECF funding. However, in that the district does not expect any future ECF funding a specific corrective action plan for such has not been developed.</i> <i>If such funding were to re-occur, the district will follow internal controls to ensure compliance with the awards – specifically ensuring updates to its inventory systems when state and federal requirements differ. Furthermore, the district would work in conjunction with knowledgeable consultant(s) and the Washington State Auditor’s office to ensure a full &amp; complete understanding of program requirements before electing to participate.</i>	
<b>Anticipated date to complete the corrective action:</b> Ongoing	

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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.

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